

Submitter: Rinehart Mac
On Behalf Of:
Committee: House Committee On Economic Development, Small
Business, and Trade
Measure, Appointment or Topic: HB3588

Dear Committee Members -

Thank you for your time and service. I am Mac Rinehart, Secretary/Treasurer of Brightside Coworking, Inc, a coworking office serving mental and behavioral health professionals in Portland Oregon. We have 3 physical offices in Portland that provide professional office space that our members reserve to conduct in person and online mental and behavioral health services for their clients. We have 175 members, most of whom are solo-practitioners providing healthcare services directly to their clients from our offices. Many of our members also use our offices to provide occasional in person services, or as a professional address since they primarily practice via telehealth services out of their homes and need to protect their privacy.

One of our services is the provision of Professional Mail Services, for which we are registered with the USPS as a Commercial Mail Receiving Agency (CMRA). The USPS requires businesses like ours that receive mail at a single delivery point and then redistribute that mail to our clients to register as a CMRA. Businesses registered as CMRAs are required to collect data that proves the identity and physical addresses of our clients. This information is collected on a document called a Form 1583. It is accompanied by 2 forms of identification from an authorized list of documents. The completion of the form must be witnessed by a member of our staff or notarized by a Notary Public. This form is submitted to a USPS database, along with digital copies of identifying documents, so that US Postal Inspectors can use this information to investigate and control mail fraud. Because we follow these regulations, we are extremely confident that our members are real people, conducting legitimate business in the state of Oregon. In our case, our members are medical professionals providing vital health care services to their clients.

Oregon statute prohibits businesses from using CMRA facilities as a place of business in their business registration. Oregon statute was written before USPS regulations were changed to include our type of business as CMRAs. The impact of Oregon statutes is that it makes it more administratively burdensome for Oregon businesses to register their place of business where they actually see and engage with their clients. Most Oregon businesses can register and renew their businesses very conveniently through the online a portal via the Secretary of State's website. Yet, for businesses using a CMRA address as their place of business, the online portal will automatically reject their application for registration or renewal. Our members must print and complete a hard copy paper application for their registration.

They must also print a copy of their membership agreement as evidence to support that their business is practicing out of our office space. We also recommend a brief cover letter explaining their circumstances. All of this is mailed to the secretary of state's offices, where applications are manually reviewed and approved. We have never had a member have their application rejected when they go through this process.

We have had some members travel to Salem to file paperwork in person, and these people have been told by staff that the Secretary of State's office is familiar with their situations, and with Brightside, and that their applications are approved provided the right documentation is supplied. In practice, this is just extra work, extra time, and extra cost that has no material impact on the outcome of the business registration. It just creates additional administrative burdens for small businesses and the Secretary of State's office.

Our ask is that the committee support HB3588, and repeal regulations that make it more difficult to register and conduct small business activities in Oregon. Thank you!