



Shaping Tomorrow's Global
Built Environment Today

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M. Dennis Knight
2024-2025 ASHRAE President

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May 15, 2025

The Honorable Mike Crapo
Chairman
Committee on Finance
United States Senate
219 Dirksen Senate Office Building
Washington, DC 20510-6200

The Honorable Ron Wyden
Ranking Member
Committee on Finance
United States Senate
221 Dirksen Senate Office Building
Washington, DC 20510-6200

Re: 2025 Budget Reconciliation – Section 112025

Dear Chairman Crapo and Ranking Member Wyden:

ASHRAE, founded in 1894, is a technical and professional society of more than 54,000 members that serves humanity by advancing the arts and sciences of heating, ventilation, air conditioning, refrigeration and their allied fields. The Society focuses on building systems, energy efficiency, indoor air quality, refrigeration, sustainability and resilient infrastructure. Through research, standards writing, publishing, certification and continuing education, ASHRAE shapes tomorrow's global built environment today.

As President of ASHRAE, I want to call your attention to a harmful provision that was included in the House Ways and Means Committee portion of the 2025 Budget Reconciliation bill. This provision, which is in **Section 112025, Name and Royalties Treated as Unrelated Business Taxable Income**, concerns changes to taxes on unrelated business income tax (UBIT), which is of grave concern to the association community. I am deeply troubled by incorporation of this provision in the budget reconciliation measure. Like many associations, ASHRAE depends on income from passive royalties to advance its tax-exempt purpose, and Section 112025 would have broad ramifications for ASHRAE and our members. In short, without this income we will have difficulty continuing our work to be the foremost source of technical and educational information, and the primary provider of opportunity for professional growth in the arts and sciences of heating, ventilation, air conditioning and refrigeration.

The professionals we serve work in a wide variety of building technology fields, all of which create jobs and generate economic returns. I ask that you remain true to the aims of your bill, which is to extend the 2017 tax cuts and grow the American economy, and **remove Section 112025**, which would change UBIT for non-profit associations.

I appreciate your attention to this matter and ask for swift action. If you have any questions or need additional information, please do not hesitate to contact me or have your staff email GovAffairs@ashrae.org. Thank you for your consideration of this critically important matter.

Sincerely,

A handwritten signature in blue ink that reads "M. Dennis Knight". The signature is written in a cursive, flowing style.

M. Dennis Knight
ASHRAE President