The Limits of the Revolving Door[*]

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Abstract

As congressional capacity has atrophied, the American lobbying landscape has increasingly shifted focus to the federal bureaucracy – a branch of government responsible for over 90 percent of US law. However, we know little about the conditions that moderate interest group influence in this setting. We introduce a new theory capitalizing on an under-explored dimension of regulatory lobbying: the revolving door. We argue that the "steep learning curve" of regulatory advocacy poses a high barrier to influence and that groups that retain former agency officials as lobbyists – and thereby enjoy insider knowledge and connections – experience exceptional lobbying success. We test this claim using original data on a sample of nationally-active interest groups' efforts to influence federal agency rulemaking through the notice-and-comment process, joint with publicly available data on registered lobbyists. Using modern text analysis tools to analyze approximately 2,000 public comments submitted over a 17-year period (2000-2016), we find no evidence of a connection between regulatory lobbying success and the revolving door. We conclude that the disparate advantages of revolving door lobbying may be the exception rather than the rule, lending greater democratic legitimacy to the administrative policymaking process.

Lobbying is the heart of American politics. Scholars have repeatedly documented the importance of organized interest groups' contributions to politics and policy – from grassroots mobilization to policy implementation (Baumgartner and Leech 1998). While a great deal of this scholarship has focused on the conditions under which these advocates build movements, fund campaigns, and contribute to electoral and party politics, a growing body of research has sought to explore interest groups' direct influence over policy outcomes, particularly in the administrative setting (Dwidar 2022a; Carpenter et al. 2023; Haeder and Yackee 2015; Kerwin et al. 2011; McKay and Yackee 2007; West 2004; Yackee 2006, 2012).

This research has demonstrated powerful effects; organized interest groups often participate in formal policymaking processes. Policymakers – legislators and bureaucrats alike – rely heavily on these groups to determine public and private preferences regarding issue agendas, evaluate possible consequences of policy decisions, identify and respond to errors and oversights in policy design, and oversee street-level policy implementation (Baumgartner and Leech 1998; Baumgartner et al. 2009a). These advocates' efforts have been found to effectively set political agendas and dictate policy outcomes across levels and branches of government.

We argue that these advocates' influence is heavily moderated by an aspect of lobbying yet to be explored by existing scholarship: the *revolving door*. Lobbying is a costly and competitive enterprise; its participants are highly strategic (McCrain 2018; LaPira and Thomas 2014, 2017). We contend that the technical nature of regulatory advocacy poses a high barrier to influence and that groups that retain former agency officials as lobbyists – and thereby enjoy insider knowledge and connections – experience exceptional lobbying success.

We test this claim using an original dataset and measurement approach relying on modern text analysis tools. Specifically, we introduce new data on all public comments submitted by a nationally representative sample of interest groups over

a seventeen-year period (2000-2016), joint with publicly available data on registered lobbyists. Moreover, because interest groups often advocate through these comments by suggesting regulatory language for inclusion in final agency rules *and* agency officials often seek and lift this suggested language, verbatim (see Dwidar 2025, Golden 1998, Haeder and Yackee 2015, Potter 2019, and West 2004, among others), we measure groups' "lobbying influence" by using plagiarism detection software to capture the degree to which each public comment's language overlaps with that of its corresponding final agency rule. We find no evidence of a connection between regulatory lobbying success and the revolving door. We conclude that the disparate advantages of revolving door lobbying may be the exception rather than the rule, lending greater democratic legitimacy to the administrative policymaking process.

Theoretical Foundations and Argument

Under what conditions do organized interest groups bear influence over public policy? This question has long plagued scholars of collective action and political advocacy. In evaluating the policy efficacy of organized interests, researchers have considered myriad activities and patterns in the American lobbying landscape, including strategic tools and tactics, informational advantages, and the bias of business (Baumgartner and Leech 1998; Baumgartner et al. 2009a). However, this work remains limited; existing scholarship has yet to account for the unique implications of insider expertise in a consequential, but under-studied setting: administrative policymaking – the setting in which the bulk of policy decision-making and lobbying activity occurs (Warren 2018; Yackee 2012).

Interest Groups and the Bureaucracy

Over the course of the last several decades, the role of organized interest groups in the American policy process has grown substantially (Baumgartner et al. 2009a; Baumgartner and Leech 1998; Baumgartner and Jones 1993; Schlozman et al. 2012, 2014). Across venues and issues, policymakers have come to rely heavily on the contributions of organizational advocates to evaluate public needs and policy solutions, craft provisions of the law, and conduct oversight (Carpenter 2002; Haeder and Yackee 2015; West 2004). This relationship is no coincidence; as the federal government experienced its "great broadening" in the mid- to late-twentieth century – a substantial expansion in the scope of government into many new policy areas – the interest group population increased exponentially as a direct response to policymakers' growing needs (Jones et al. 2019; Hojnacki 1997, 1998). Meanwhile, as the major political parties polarized and analytic capacity in Congress atrophied in the late twentieth century, conditions of gridlock have decreased the level of substantive, detailed lawmaking by the legislative branch (Jones et al. 2019; Lewallen 2020). The vast majority of modern policymaking has thus steadily fallen to agents of the federal bureaucracy working to implement provisions of the law. In fact, to date, over *90 percent* of U.S. law is of agency, rather than legislative, origin (Warren 2018).

This disposition of lawmaking authority has compounded the growing power of American interest groups. Interest groups have long maintained close relationships with federal agencies and their operatives (McKay and Yackee 2007; Yackee and Yackee 2006; Yackee 2012). They contribute to bureaucratic policymaking in myriad ways – helping bureaucrats to determine public and stakeholder responses to policy decisions (Hrebenar 1997), raise awareness of policy issues facing agencies (Hrebenar 1997; Rourke 1984), secure budgets (Berry 1989), resist political control (Carpenter 2002), and craft policy language (Dwidar 2025; Haeder and Yackee 2015). And while historically, scholars have focused on the role of interest groups as partners

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with Congress in guiding the bureaucracy (by "policing" agencies and sounding "fire alarms" in response to problematic actions – see McCubbins and Schwartz 1984, McCubbins et al. 1987 and 1989, and Epstein and O'Halloran 1996 and 1999), a wealth of research has demonstrated evidence of direct relationships between groups and federal agencies (see Dwidar 2022a; 2025, Cropper 1992, Golden 1998, McKay and Yackee 2007, Nelson and Yackee 2012, and Yackee 2012).

This relationship, scholars argue, is largely sustained by bureaucrats' formal and informal incentives; by law, all federal agencies are required to solicit and review public responses to their policy proposals and federal courts have historically encouraged agencies to be more responsive to groups and citizens who contribute to this process (McGarity 1992, 1997; Rabin 1986; Shapiro 1988). The ongoing threat of judicial review is thus a powerful motivator for bureaucrats to engage in good faith with public participants in agency policymaking (Chubb 1983; West 1984). Moreover, like other government officials, these civil servants have strong motivations to pursue the best implementation protocols for the provisions of the law they have been tasked with regulating (Golden 1998; Kerwin 2003; Kerwin et al. 2011); qualitative research describes these policymakers as highly professionalized, driven to produce well-rounded and well-researched policy, and incentivized to avoid public scandal and critique by political principals (Dwidar 2025; Potter 2019; Kerwin et al. 2011; West 2004). Thus, agency bureaucrats often rely on the perspectives of outside groups participating in the regulatory process to ensure reasoned and rigorous policy decisions.

Consequently, a growing body of research has sought to explore the efficacy of various lobbying conditions and tactics in the administrative setting. Nixon et al. (2002), for instance, report that private and professional interest groups do not dominate influence in notice-and-comment rulemaking – though more recent work has found evidence of substantial wealth-based inequalities in agency rulemaking (Carpenter et al. 2023). Several other works point to the importance of collaboration in

regulatory lobbying; Dwidar (2022a) demonstrates that federal agencies favor policy recommendations from interest groups advocating in coalitions with organizationally diverse memberships, rather than coalitions that are dominated by business interests. McKay and Yackee (2007) and Nelson and Yackee (2012) relatedly observe that coalition size and consensus across lobbying groups moderate regulatory influence.

The Revolving Door

The revolving door – the phenomenon of former government officials departing their public roles for employment in the private sector – has received growing scholarly and media attention. In a recent piece, *The Washington Post*'s Editorial Board decried, "Gone – long gone – are the days when members of Congress scrupled to become lobbyists upon their departure from office. Now, representatives and senators spin like dervishes through the revolving door." Researchers have similarly approached the trend of revolving door lobbying with skepticism; scholars have pointed to the damning normative implications of the practice – wherein "revolvers" enjoy privileged access that conventional lobbyists, particularly those advocating for the ordinary citizen – can never obtain (LaPira and Thomas 2017).

However, little research explores the prevalence and consequences of revolving door lobbying (LaPira and Thomas 2014). In the mid-twentieth century, a small handful of works attempted to offer estimates of the population of revolving door lobbyists, with mixed findings. Milbrath (1963) estimated that less than half of the lobbyist population entered the profession through the revolving door, while Zeigler and Baer (1969) estimated this number to be far lower – at just over an eighth. Throughout the late-twentieth century, scholars largely approached a consensus: that the number of "revolvers" was approximately half of the lobbyist population (Berry 1977; Schlozman and Tierney 1986; Heinz et al. 1993).

In later years, others sought to asses the impact of the revolving door, albeit in

the opposite direction. One of the most prominent such studies evaluated the effects of "revolving" in the reverse, in the case of FCC Commissioners with previous work experience in the broadcast industry (Gormley 1979). Gormley demonstrated evidence of a relationship; those Commissioners who had previously worked in industry were more likely to side with the industry position in the regulatory process. Scholars later built upon these findings by extending Gormley's analysis to other agencies (see Quirk 1981) and accounting for other individual and institutional conditions, such as Commissioner characteristics, congressional influences, and presidential influences (see Cohen 1986); these works offered further evidence of a connection between agency decisions and the presence of reverse-revolvers.

More recently, scholars have worked to establish a baseline understanding of the size, scope, and nature of the population of revolving door lobbyists. These works established a series of key findings. First, revolvers consider their employment history to be critical to their success in subsequent roles – around 70% believe that their previous employment in government contributes to their issue expertise and nearly 90% believe that their employment history provides unique insider knowledge of policy decision-making processes that enables them to succeed in their subsequent careers (Heinz et al. 1993). Second, these perceptions of value are grounded in reality – Baumgartner et al.'s (2010) seminal work demonstrates that the employment of a covered official is one of the *most consistent* indicators of lobbying success.[1] Baumgartner et al. (2010) conclude that this finding is evidence of the value of the unique and prized resources that revolvers offer to their organizational employers: connections and information – advantages that often make for more successful lobbying. And third, interest groups are willing to pay a high premium for these unique resources: Blanes i Vidal et al. (2012) demonstrate that revolving door lobbyists generate higher returns (i.e., higher salaries) for their lobbying work; Ban, Palmer, and Schneer (2019) report that

[1]The term "covered official" was established under the Lobbying Disclosure Act (LDA) of 1995 to refer to lobbyists who have held government positions in the previous 20 years.

former congressional staffers-turned-lobbyists garner higher revenues during times of policy uncertainty; and Liu (2020) finds that businesses tend to favor revolving door lobbyists over conventional lobbyists in periods of policy uncertainty.

Building upon these foundations, LaPira and Thomas's (2017) work offered the first systematic, large-scale analysis of the size and scope of the revolving door in American national politics. They contribute a series of critical insights: that the revolving door is "much bigger than the existing lobbying disclosure regime reveals and...significantly distorts the representation of interests before government," that most revolving door lobbyists come from Congress (both former members and rank-and-file staffers), and that revolvers generally work as contract (rather than in-house) lobbyists – and are often hired to work on issues of appropriations. Since the publication of LaPira and Thomas's work, scholars have sought to better understand the nature of the revolving door in American lobbying. Maske (2017), for instance, reports that lobbying by former members of Congress increases the likelihood that a piece of legislation will pass and that highly effective members often go on to become highly effective lobbyists, should they choose to enter the revolving door. McCrain (2018) demonstrates that the value provided by a former congressional staffer-turned-lobbyist is often a function of their relationships with former coworkers on Capitol Hill. Similarly, Shepherd and You (2020) find that congressional staffers work to "showcase" their abilities to potential organizational employers *prior* to departing their positions in Congress – by producing more legislative outputs in issues of higher lobbying interests and granting greater member access to lobbying firms.

This burgeoning area of research – particularly in recent years – is evidence of the normative and practical importance of the revolving door lobbyist in American policymaking. The revolver, as evidenced by the above-mentioned scholarship, is a meaningful subject of analysis with wide-ranging consequences for the substance, strategies, and outcomes of organizational advocacy. However, beyond the research

that we have previewed in earlier paragraphs, very little attention has been paid to the policy consequences of the revolving door, particularly in the administrative setting. In fact, absent the small handful of earlier works (see Cohen 1986, Gormley 1979, and Quirk 1981), to our knowledge, no existing research has evaluated the policy consequences of this phenomenon in the regulatory setting – arguably the most consequential policymaking venue in modern American politics.

Regulatory Lobbying and the Revolving Door

Policy advocacy targeting the American federal bureaucracy is highly unique; more than its counterparts in other political institutions, regulatory lobbying is characterized by the importance of highly quality, evidence-based, policy information. Moreover, qualitative research on this process has described bureaucrats' unique interests in incorporating information received from outside groups in their decision making through the notice-and-comment process; Dwidar's 2025 book, for instance, dictates a conversation with an agency official with rulemaking duties in which the official describes, "within [my agency's] four walls, we can only do so much. Information from [outside groups] is extremely helpful to us...they always have some information that we don't." Later, she describes a conversation in which an agency official highlights the kind of information that is most valuable in their decision-making, "the comments that are most useful to us [have] high expertise...they make detailed arguments with supporting evidence."

These anecdotes underscore the importance of calculated, well-researched policy advocacy in the regulatory setting. Unlike other policymakers, agency bureaucrats enjoy a great informational advantage. They have high expertise and retain the in-house capacity to extensively research the intricacies and consequences of myriad policy choices. Many of the nation's foremost policy experts serve as advisers and researchers in federal agencies, further reinforcing their informational edge. However,

these actors and agencies are still subject to many of the same limitations prevalent in an organizational setting, such as institutional, procedural, and cognitive constraints. Dwidar's interviewee directly suggests as such through their statement, "within [these] four walls, we can only do so much."

The federal bureaucracy's informational advantage is thus heavily supplemented by the contributions of public participants to their policy processes. In recent years, scholars have explored the impact of intra- and extra-organizational factors on the outcomes of regulatory lobbying; these works report that agencies tend to favor policy recommendations coming from well-resourced groups and advocates working in collaboration with others; scholars have theorized that these conditions serve to facilitate the provision of higher quality, well-rounded advocacy content. We contend that the employment of revolving door lobbyists should strongly relate to interest groups' regulatory lobbying influence *(Hypothesis 1)*.

Our logic is simple: as the existing literature has outlined, revolvers have unique and valued expertise and access – ranging from extensive issue-based knowledge to insider connections to a strong understanding of *how* to most effectively frame, craft, and support proposed policy recommendations. As such, revolving door lobbyists are in high demand; scholars have found them to be a valuable political commodity, generating higher salaries for their lobbying work and greater demand for their employment than conventional lobbyists (Blanes i Vidal et al. 2012; Ban et al. 2019; Liu 2020). In the regulatory setting, as Dwidar (2025) suggests, a premium is placed on high-quality information; regulatory policymaking is enormously technical and complex, and rulemakers privilege advocacy content with detailed, informed, and well-rounded recommendations. Interest groups should be well-served by retaining lobbyists with unique capacities to produce this kind of advocacy – i.e., revolvers.

However, some revolvers are surely more effective than others. Thus, we contend that the employment of revolving door lobbyists with work experience in the

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regulatory setting – i.e., former agency employees – should strongly relate to groups'
regulatory lobbying influence *(Hypothesis 2)*. While the mere experience of working in
government should offer the employers of revolvers strategic, tactical, and political as-
sets in lobbying, due to the highly technical and opaque nature of agency rulemaking,
the employment of a former agency official should offer additional key advantages. As
our earlier discussion suggests, effective regulatory advocacy requires informational
quality that is difficult for many groups to achieve. It often necessitates the retain-
ment of consultants and policy experts, legal staff, and/or the commissioning original
studies or data about the subject of agency regulation. As such, scholars have found,
for instance, that wealthier groups (i.e., those with the financial resources to hire
experts, commission studies, and purchase data) are often more effective than their
less resourced counterparts (Carpenter et al. 2023). Moreover, public comments sub-
mitted under conditions that allow for a greater exchange of information and ideas
(i.e., representationally diverse coalitions) are significantly more effective than their
homogeneous counterparts or groups advocating alone (Dwidar 2022b, 2025).

Data

We test our claims using original data documenting the regulatory advocacy ef-
forts of a nationally-representative sample of interest groups, joint with publicly avail-
able data on registered lobbyists. We identified instances of regulatory advocacy by
collecting all public comments submitted by our sample of organizations over a sev-
enteen year period (2000-2016). To measure the influence of each advocacy effort,
we leveraged modern text analysis tools to capture each comment's influence over its
corresponding final agency rule.

Notice-and-Comment Rulemaking

Agency policymaking derives from the lawmaking authority of Congress and the president, and is governed by the Administrative Procedure Act (APA, 1946). The APA specifies that upon enactment, new laws must be sent to the appropriate federal agencies for implementation; most commonly, this implementation occurs through the "notice and comment" process.[2] Notice and comment rulemaking involves three steps. First, agencies must draft "proposed rules" describing their preferred implementation procedure for the provision of law they have been tasked with. Second, agencies must publicize these draft rules during a specified period; this period is referred to as the "comment period." During these periods, any entities – including private citizens, elected officials, business corporations, organized interest groups, and more – may submit comments expressing their opinions on the proposed rule.[3]. Some comments simply express approval or disapproval; most comments, however, are lengthy and make detailed recommendations for how the agency may improve the drafted regulatory content. These comments – particularly those from advocates with expertise in the area of the rule and a connection to the communities that may be impacted by the rule – are a vital source of information for agency officials. Finally, upon the closure of the comment period, agencies are mandated to review and respond to all comments and issue a legally-binding final rule.

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[2]While a growing proportion of agency rules are finalized outside of the scope of this process, the vast majority of agency policymaking occurs through notice-and-comment rulemaking (approximately 71 percent of all published final rules; see GAO 2012, available here). Adherence to this process is of paramount importance to federal agencies due to both its legal requirement (as per the APA, with few exceptions, all agencies are required to engage in notice-and-comment rulemaking) *and* for allowance of the degree of public participation historically encouraged by the courts in judicial reviews of agency rules (see Lowande 2018, Potter 2019, Raso 2018, and West 2004).

[3]A wide range of participants contribute to this process. While ordinary citizens *can* offer public comments, most contributions to comment periods come from organized interest groups. Scholars have documented that interest groups submit the vast majority of comments (see Golden 1998, Kerwin 2011, and West 2004) and that industry and business groups do not dominate influence in notice and comment rulemaking (see Nixon 2002). Moreover, social and economic justice organizations – interest groups advocating for socially and economically marginalized communities – contribute frequently to this policy process (see Dwidar 2025)

Importantly, agencies face no requirement to alter their draft rules to fit with the preferences of commenters. Some scholars have thus argued that few significant changes are made in response to the notice and comment period; Yackee 2012, for instance, demonstrates that policy changes made in response to the notice and comment period are more limited than those that occur in earlier stages of the regulatory process – such as rule development. However, the notice and comment period *still* represents a highly critical advocacy venue. Due to legal mandates and the ever-present threat of judicial review, agency officials have strong incentives to engage with commenters in good faith (see Rabin 1986, Shapiro 1988, McGarity 1992; 1997). As such, a large body of work has found substantial evidence of comment influence during the notice and comment period (see Haeder and Yackee 2015, McKay and Yackee 2007, Yackee 2006; 2006; 2012).

Interest Group and Rule Selection

We analyze the comment patterns of a stratified random sample of 50 interest groups active in national politics between the years of 2000 and 2016. Our study evaluates all public comments submitted by these groups throughout our period of study, ultimately totalling to 1,849 public comments submitted on 1,674 rules proposed by 86 federal agencies. To capture our sample, we relied on data compiled by the Center for Responsive Politics (CRP). Using the CRP's data, we defined the population of interest groups groups "active in national politics" as all those that submitted at least one lobbying disclosure report during our period of study. To produce our sample, we then drew a stratified random sample of 50 organizations from this population; the sample was stratified according to organizations' advocacy foci using the CRP's

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category codes – classifications of groups' main policy/industry emphases.[4] Thus, for instance, the proportion of advocates with an advocacy focus on the issue of energy and natural resources in our sample is roughly equivalent to the proportion of such advocates in the broader sampling frame.

This sample is not intended to be equally representative of all types of groups, agencies, and policy areas. Rather, it is intended to be representative of the policy landscape as it pertains to *lobbying* by the nationally-active interest group population. Group types, agencies, and policy domains are thus present in the data at rates commensurate to the degree to which they are active and present on the national lobbying and policy agendas. Our results should therefore generalize to modern lobbying activity by the national interest group population at large. Additionally, it is important to note that our sample size was chosen strategically, with practical considerations in mind. To generate data for this sample of groups – and corresponding regulatory documents – over 10,000 public comments were read and each observation was hand-coded across twenty attributes (producing approximately 40,000 observations); in total, this process required the employment of twenty-three research assistants over a four-year period. The sample size thus represents a sensible compromise between practical limitations and inferential strength.

Table 1 depicts the interest groups appearing in our sample according to their organizational categories. The majority of organizations in the sample (56 percent) are trade, business, or industry groups, such as the National Newspaper Association, the Banker's Association for Finance and Trade, and the National Association of Realtors. Citizen groups follow closely, at 24 percent, including advocates such as the Interfaith Alliance and Americans United for the Separation of Church and State,

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[4]The CRP's category codes are classifications of organizations' main policy/industry emphases. These category codes are assigned by the CRP on the basis of information from registrants' websites, annual reports, and financial filings, alongside news articles discussing their advocacy. In ambiguous cases, coders may turn to registrants' self-reported general issue area codes and specific lobbying issues, as provided on their LDRs. Regrettably, the CRP's coding guide is not publicly available; these procedures were confirmed through direct correspondence with their research team.

whilst professional and occupational groups compose approximately 12 percent of the sample. Labor unions, governmental associations, and Native American tribes compose the smallest proportions of the sample, at only 4, 2, and 1 percent, respectively. No think tanks or charitable foundations appear in the sample.

Table 1: Sample by Organizational Category

Group type	Frequency	Percent
Business or industry group	10	20.00
Labor union	2	4.00
Professional association	6	12.00
Citizen group	12	24.00
Governmental association	1	2.00
Trade association	18	36.00
Native American tribe	1	2.00
Total	50	100%

The sample consists of interest groups specializing in a wide range of policy areas. Table 2 illustrates the primary policy foci of the organizations appearing in our sample. Interest groups specializing in the policy areas of health compose the largest proportion of the sample, at 20 percent; this finding is unsurprising – it is likely due to the prevalence of healthcare policy reform on the national political agenda during our period of study. Organizations with a focus on manufacturing and distributing (10 percent), insurance, and real estate (8 percent), transportation (8 percent), labor (8 percent), and communications/electronics (6 percent) follow closely. The remainder of the sample is fairly equally dispersed across all other policy foci, ranging from 1 to 4 percent of sample members advocating in the policy areas of agriculture, defense, energy and natural resources, the environment, and Indigenous issues.

Table 2: Sample by Policy Focus

Policy Focus	Frequency	Percent
Agriculture	1	2.00
Business	2	4.00
Communications/electronics	3	6.00
Defense	2	4.00
Education	1	2.00
Energy & natural resources	2	4.00
Environment	2	4.00
Finance, insurance, and real estate	4	8.00
Health	10	20.00
Ideological/single-issue	3	6.00
Labor	4	8.00
Manufacturing & distributing	5	10.00
Native American tribes	1	2.00
Transportation	4	8.00
Other	6	12.00
Total	50	100%

Collecting and Preprocessing Comments and Rules

To collect all public comments submitted by the interest groups in our sample during our period of study, we relied on *Regulations.gov*'s interactive Application Programming Interface (API).[5] Our procedure required four steps: First, we built queries to call all public comments submitted by each group in the sample durring our temporal domain. We specified parameters for docket type (rulemaking), received date range (January 1, 2000 to December 31, 2016), and keyword (name of the group). We then read each comment returned by each query and removed false

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[5]*Regulations.gov* is a website that was launched in January 2003 as part of an e-rulemaking transparency initiative by the Bush Administration. This website provides a repository for all regulatory actions and rulemaking materials — past, present, and future — and serves as a portal for public participation in the notice-and-comment process.

positive results.[6] Next, we used optical character recognition (OCR) software to transcribe each public comment, which we supplemented with manual transcription and error-correction where necessary. Finally, to facilitate the text analytic portion of our analysis, we preprocessed all public comment and regulatory documents. This procedure, in line with standard conventions for text analysis, involved the conversion of all words to their stems[7] and removal of stop words[8], figures, graphics, appendices, and capitalization (Grimmer and Stewart 2013).

The agencies appearing in the data span a range of sizes and specializations – from agencies such as the U.S. Forest Service to the Drug Enforcement Administration to the Centers for Medicare and Medicaid Services – as well as a mix of independent (75 percent) and executive branch (25 percent) agencies.[9] The proposed rules in the data similarly encompass a range of policy topics; as illustrated in Figure 1, 20 out of the 21 major topics proposed by the Policy Agendas Project's common policy coding scheme are present. Many of the proposed rules in the data fall in the areas of health and environmental policy, at approximately 33 and 17 percent of all proposed rules, respectively. This trend reflects the policy context, as these policy subjects were ubiquitous on the national governmental agenda during the period of study. The rules are also characterized by ranges of complexity and salience. They include straightforward, low-salience proposals, such as a proposed rule exempting certain system of records from provisions of the Privacy Act, and more technical and salient

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[6]The *Regulations.gov* API only allows for free-text searches, rather than searches by comment author. Thus, the above-mentioned queries yielded all public comments in which a given interest group was *mentioned*, rather than all comments *authored* by a given group. For reference, the initial queries returned approximately 10,000 comments, of which 1,849 had been submitted by the groups in our sample.

[7]A "stem" is the root of a word remaining after suffixes are removed. For example, the words "traveling", "traveled", and "traveler" share the same stem: "travel". Stemming words in a corpus allows for the grouping of words that share a substantively common meaning, but may differ superficially.

[8]Stop words are words that serve a grammatical purpose and do not otherwise convey meaning. Examples include "a", "but", "and", "how", "or", and "what".

[9]Source: Administrative Conference of the United States, Sourcebook of United States Executive Agencies, 2012.

efforts, such as proposed rule defining the scope of waters protected under the Clean Water Act.

Figure 1: Proposed Rules by Policy Topic
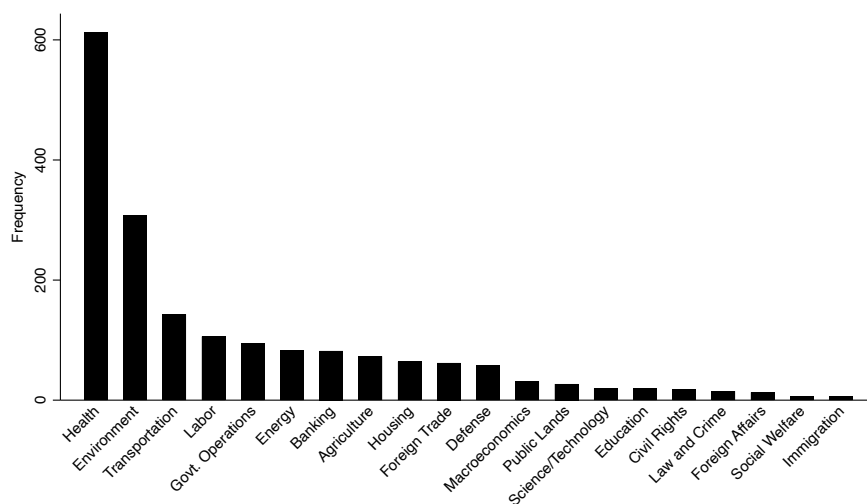
Dependent Variable

To operationalize interest groups' "lobbying influence," we compared the text of each comment submitted by each group to its corresponding final rule and produced a measure of global textual similarity between the documents. We did so by using a plagiarism detection software called WCopyfind, a tool that compares textual documents and reports similarities in their words and phrases. WCopyfind allows users to select and edit comparison rules before execution. We adopted the following comparison rules to detect all *perfectly matching* phrases between comment-final rule pairs. These decision rules were informed by existing research that has found them to be reliable for detecting text re-use in policy documents (Clough and Stevenson 2011; Kroeger 2016; Lyon et al. 2001).

- Shortest phrase to match[10]: 6 words

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[10]Minimum string length considered to be a match.

- Most imperfections to allow[11]: 2

- Minimum percent of matching words[12]: 100%

- Skip non-words[13]

- Skip words longer than 20 characters[14]

We then counted all words contained in perfectly matching phrases for each comment-final rule pair; this count represents our final operationalization of groups' lobbying influence. This variable spans a wide range, from 0 to 6,286 (mean = 176; standard deviation = 489)

Independent Variables

Our primary independent variable captures the presence of lobbyists (in-house or contract) employed by a given group, in a given year, who previously held any federal government position. To construct this variable, we engaged in a manual data collection process. First, for each of the interest groups in our sample, we identified all in-house or contract lobbyists active within the years of our study from the CRP lobbying dataset ($N = 749$). We then engaged a team of undergraduate research assistants in a search protocol closely replicating that of LaPira and Thomas (2017). In line with LaPira and Thomas's 2017 methodology, for each lobbyist, research assistants completed searches of the CRP Revolving Door database, in which the CRP classifies revolvers as those with previous federal government employment or appointment on a "non-compensated federal government advisory board, independent commission, or congressional-, presidential-, or Cabinet-member-appointed entity."[15] We

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[11]Maximum number of non-matches allowed between perfectly matching portions of a phrase.

[12]Minimum percentage of perfect matches that a phrase can contain and be considered a match. Setting this value at 100% limits WCopyfind to returning only perfect matches.

[13]Words containing any characters other than letters, except for internal hyphens and apostrophes.

[14]Often non-textual items, including filenames, URLs, or image data.

[15]See https://www.opensecrets.org/revolving-door/methodology; this database is based on a combination of Columbia Books' Washington Representatives/Lobbyists.info data source (circa 2006), alongside regular updates by CRP staff from "internal resources and publicly available sources."

supplemented these data with searches of LinkedIn, lobbying firm or organizational websites (e.g. lobbyist profile pages espousing former government work experience, identified using the name of "registrants" provided in LDA forms) and other available online sources.[16] Research assistants additionally catalogued all available former federal government positions – as well as start and end years, when present. This variable is ultimately operationalized at the group-year level through the *proportion of the number of lobbyists with previous work experience in the federal government.*[17]

Beyond this key measure, we also collected a series of secondary independent and control variables. First, we collected data on the *financial capacity* of each member of the sample. As we describe earlier, lobbying is often more effective when lobbying entities have greater financial resources. Thus, to account for this dynamic in our analyses, we recorded each group's total revenue (dollar amount) in the year of comment submission. We collected these data from information made available by Propublica's Nonprofit Explorer. This variable ranges widely – from 7,778 to 284,000,000 (mean = 89,600,000; standard deviation = 90,700,000). Additionally, as a consideration for the exceptional reputation of businesses and their representatives in Washington (see Hojnacki et al. 2015), we accounted for whether or not each organization in our sample represented a *business interest*; this variable is binary and was coded according to the organizational type coding scheme available in Table 4.[18]

Next, we compiled information on the salience of each proposed rule in the data. Proposed agency rules vary substantially in the degree of visibility and attention that they receive. When proposed rules are of greater consequence, or when they are relevant to a broader audience, more actors may attempt to debate their content, often

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[16]These supplemental searches were conducted in 2023.

[17]The unit of analysis is group-year; thus, this variable captures the volume of revolvers employed by a given group, in a given year, who previously held any federal government position. Additionally, as a test of robustness, we additionally computed a category-specific iteration of this variable that differentiates prior work experience in the federal bureaucracy from experience in Congress or the White House.

[18]This coding scheme was informed by the work of Baumgartner et al. 2010 and Hojnacki et al. 2015.

by submitting public comments. In these more competitive and costly environments, groups face greater barriers to lobbying influence (Baumgartner et al. 2009a). To account for this possibility, we operationalized the *salience of each proposed rule* through the total number of public comments submitted in response to the rule. This variable spans a wide range, from 1 to 4,343,039 (mean = 61,075; standard deviation = 374,332).

Third, we collected information on the complexity of each proposed rule. More complex public policies often span multiple constituencies and policy topics. As executive branch officials navigate complex policy design, they often turn to external actors to fill informational gaps (West 2004). To account for this potential relationship, we operationalized the *complexity of each proposed rule* through the total number of distinct policy sub-topics encompassed by the summary of each proposed rule.[19]

Fourth, we developed a measure of *proposed rule-public comment similarity*. Final rules almost certainly contain a proportion of text from their original proposed rules. Public comments often quote language from the proposed rules they seek to influence. They may do so either as a point of comparison to their own recommendations or to direct bureaucrats to the sections of the proposed rules they reference. Importantly, this quoted language may remain in the final rule, and may thus contribute to an over-estimation of our dependent variable. To address this potential measurement concern, we computed this measure using the same methodology used to compute our dependent variable.

Finally, public comments that contain more text are likely to share more language with the final rule. To account for this simple, but likely, relationship, we recorded the *length of each public comment*. We operationalized this variable through the total number of words contained in each comment after preprocessing. This variable also

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[19]We executed this coding procedure using the Policy Agendas Project's common policy coding scheme and coding guidelines.

spans a wide range, from 41 to 249,742 (mean = 3,681; standard deviation = 13,165).

Summary Statistics and Empirical Strategy

In total, the interest groups in our sample employed or contracted 749 lobbyists during our period of study (2000-2016). Of these lobbyists, 418 (56 percent) were classified as "revolvers" – i.e., lobbyists with previous employment experience in the federal government. This statistic closely aligns with LaPira and Thomas's 2017 work, which reports a 52 percent rate of revolver status.[20] Additionally, we find that those with revolving door experience in our data held 912 unique positions in the federal government (see Appendix A). On average, our sample of lobbyists held 2.18 federal government positions (standard deviation = 1.39); this similarly approximates LaPira and Thomas's (2017) corresponding finding (1.8 positions). These trends in our data – and their similarities to those reported in prevailing scholarship – lend confidence to the representative nature of our sampling procedure and data.

Table 3 depicts the revolving door lobbyists in our data according to their former government employment.[21] Consistent with existing research on the revolving population, congressional staff are the most common category of revolvers, at 42 percent of all government positions catalogued in our data. White House positions compose the second-most common category, at nearly 21 percent. In contrast, lobbyists revolving from the federal bureaucracy are substantially less common – less than 7 percent of revolvers in our data are former agency employees. Lastly, former Members of Congress

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[20]As a point of comparison, we contrasted the lobbyists in our data to those listed in the "covered official" data reported by all registered lobbyists on quarterly LD-2 forms during our period of study; we found that in these publicly available records, only 23 percent of lobbyists in our sample would be classified as revolvers. This comparison – alongside the proportion of revolvers in our data captured using our hand-coded approach – aligns closely with LaPira and Thomas's 2017 work, which demonstrates that the LDA data significantly under-capture the revolving door relative to a manual search process (at 22 percent in the former and 52 percent in the latter). These trends in our data lend further confidence to the representative nature of our sampling approach.

[21]The coding scheme underlying Table 3 was informed by previous research (see LaPira and Thomas 2017 and McCrain 2018)

compose the smallest category of revolvers catalogued, at less than 1 percent.

Table 3: Revolving Door Lobbyists by Former Government Employment

Former Employment	Frequency	Percent
Congressional staffer	316	42.19
Member of Congress	5	0.67
Federal agency	49	6.54
White House	157	20.96
Other federal office	25	3.34

Table 4 illustrates the distribution of revolving door experience in our data according to organizational employers. The majority of revolvers in our data (52 percent) were employed by trade associations. 25 percent of revolvers were employed by professional associations and 7 percent, by business or industry groups. In total, business, industry, and occupational groups hired nearly *84 percent* of the revolvers identified in our data. In contrast, citizen groups, labor unions, and governmental associations employed approximately 14 and 7 percent of revolving door lobbyists, respectively. These patterns follow theoretical intuition and findings from existing research that demonstrate a strong connection between the representation of moneyed interests and hiring of revolving door lobbyists.

Table 4: Revolving Door Lobbyists by Group Type

Group type	Number of revolvers	Percent revolvers
Business or industry group	29	6.78
Labor union	6	1.40
Professional association	107	25.00
Citizen group	54	12.62
Governmental association	3	0.70
Trade association	222	51.87
Native American tribe	7	1.64
Total*	428	100%

*Lobbyists in our sample can appear under contracts with multiple organizations, thus, N exceeds 418.

Models

To test our hypotheses, we estimated a series of generalized linear regression models with group-clustered standard errors.[22] In all models to come, the dependent variable is measure of lobbying influence (textual similarity between comment-final rule pairs) and the independent variables, measures of the employment of revolving door lobbyists. The models control for organizational characteristics (financial capacity, business interest), characteristics of the targeted public policy (complexity, salience), and characteristics of the underlying public comment (textual similarity between the public comment and the original proposed rule, public comment length). We additionally account for potential correlations within the data by clustering the standard errors by group. These relationships can be formally expressed by the following equation, where $Y = \gamma(\mu|\phi)$:

$$
\begin{aligned}
ln(E(Y|X) = \beta_0 &+ \beta_1 RevolvingDoor \\
&+ \beta_2 FinancialCapacity \\
&+ \beta_3 BusinessInterest \\
&+ \beta_4 PolicySalience \\
&+ \beta_5 PolicyComplexity \\
&+ \beta_6 ProposedRuleCommentSimilarity \\
&+ \beta_7 CommentLength
\end{aligned}
\tag{1}
$$

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[22] We rely on gamma regression models with log link functions. This modeling choice is appropriate due to the distribution of the dependent variable under study; this variable, textual similarity between comment-final rule pairs, is bound at 0. This condition rules out the use of simpler models – such as ordinary least squares linear regression – which require continuous dependent variables. Other aspects of the models we deploy, including sample size, further validate our modeling choice. For instance, statisticians encourage the use of MLE when the number of observations in the model is greater than 200 and when at least twenty observations per parameter are present (Long 1997).

Results

Figure 2 visualizes the results of Model 1.[23] This model evaluates whether the employment of revolving door lobbyists relates to interest groups' regulatory lobbying influence *(Hypothesis 1)*. It offers a few key findings: first, there is a statistically insignificant relationship between the employment of revolving door lobbyists and interest groups' lobbying influence. In other words, the employment of revolving door lobbyists has no bearing on groups' lobbying success. This finding lends no support to our hypothesized notion that revolving door lobbyists, generally, yield exceptional policy outcomes for their interest group employers. In so doing, this observation also runs counter to previously theorized – though untested – assumptions regarding the efficacy of the revolving door.

Second, the remaining variables in Model 1 share theoretically intuitive relationships with the dependent variable (e.g., policy salience, comment length, comment-proposed rule similarity); for instance, policy salience shares a negative and statistically insignificant association with the dependent variable, suggesting that regulatory lobbying is more impactful when targeting less salient regulatory proposals. This particular result reiterates a common theme from the existing scholarship – that groups are often more successful when targeting issues with narrower scopes of conflict (Baumgartner et al. 2009b; Schattschneider 1960). Altogether, these supplemental findings lend confidence to the robustness of this initial model.

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[23]See Appendix B for the corresponding regression table.

Figure 2: Estimation of Lobbying Influence (Model 1)
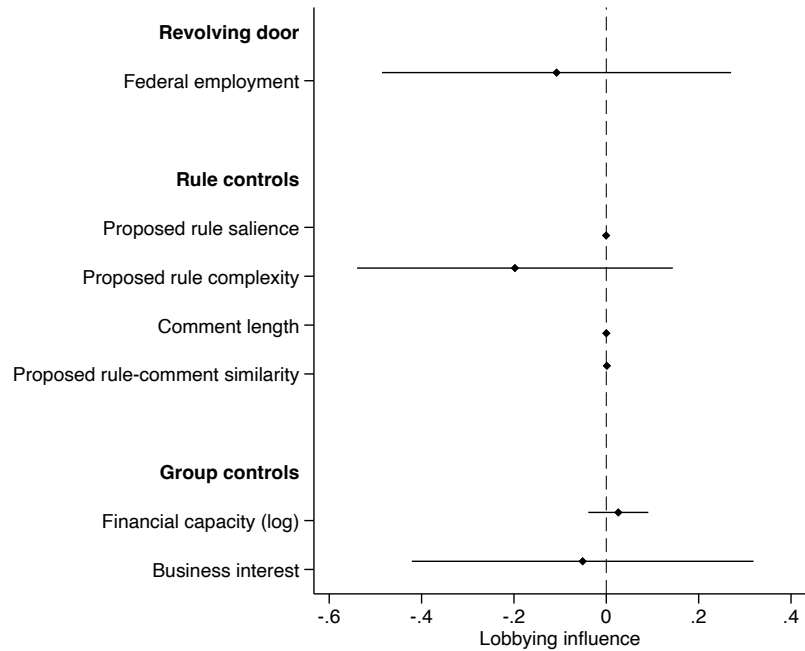
Generalized linear regression model (Gamma family, log link function) with group-clustered standard errors. $N = 610$. Diamonds indicate coefficient values. Lines indicate 95% confidence intervals. Revolving door is measured as the proportion of lobbyists with former federal government experience.

Figure 3 visualizes the results of Model 2.[24] This model evaluates whether the employment of revolvers with work experience in the *regulatory setting* relates to groups' lobbying influence *(Hypothesis 2)* – as it may reasonably be the case that the specific nature of revolvers' prior government experiences governs the efficacy of their lobbying, particularly in the highly technical and complex process of agency rulemaking. However, the results demonstrate, once again, a statistically insignificant relationship between the employment of revolvers with previous work experience in the federal bureaucracy and lobbying influence. In other words, the hiring of former agency employees as lobbyists has no bearing on interest groups' lobbying success in the regulatory setting. This finding, too, runs counter to our hypothesized expectation.

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[24]See Appendix B for the corresponding regression table.

Meanwhile, the remaining relationships in the model share theoretically intuitive findings that are consistent with those of Model 1 and findings in the broader literature: there is a negative and statistically significant relationship between policy salience and lobbying outcomes; similarly, there is a statistically insignificant relationship between organizations' financial capacities and influence. These relationships, alongside others in the model (e.g., comment length, comment-proposed rule similarity) are consistent with research findings regarding the importance of subsystem attention to lobbying outcomes and the lack of evidence of a direction connection between monetary resources and lobbying power (see Baumgartner and Leech 1998 and Baumgartner et al. 2010).
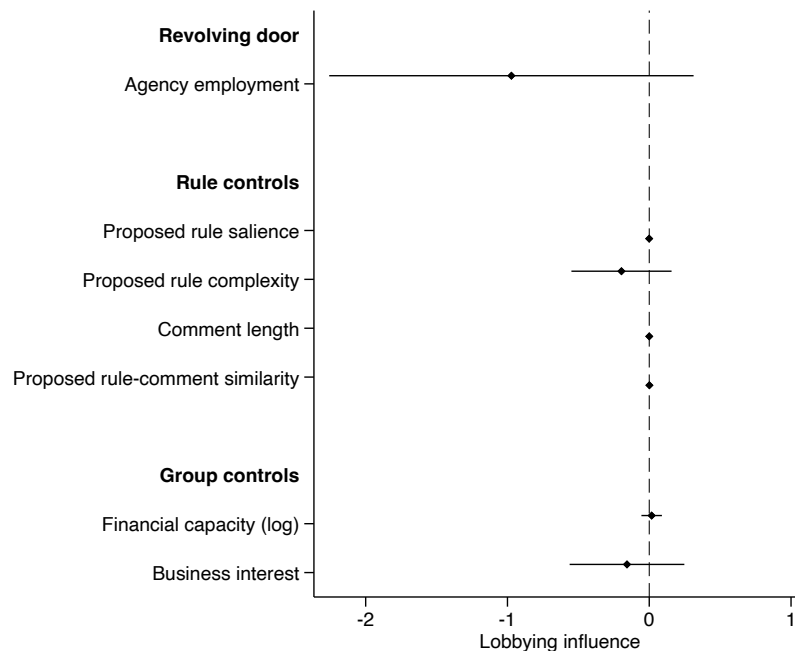
Figure 3: Estimation of Lobbying Influence (Model 2)

Generalized linear regression model (Gamma family, log link function) with group-clustered standard errors. $N = 610$. Diamonds indicate coefficient values. Lines indicate 95% confidence intervals. Revolving door is measured as the proportion of lobbyists with former experience in the federal bureaucracy.

Returning to the primary finding of this analysis: that the retainment of former

agency employees as lobbyists, alone, does not relate to interest groups' regulatory lobbying influence. This finding, alongside that of Model 1, is genuinely surprising. It carries a series of implications. Most prominently, these findings suggest that scholarly, organizational, and popular perceptions of the unique value of revolving door lobbyists reflect the exception, rather than the rule. To our knowledge, this work represents the first comprehensive empirical study of the *outcomes* of revolving door lobbying. Thus, while our findings challenge prevailing assumptions, they do not challenge existing research; rather, they advance a burgeoning area of study in an important direction. They suggest, clearly, that the employment of revolving door lobbyists, alone, does not relate to exceptional outcomes for interest groups seeking to influence agency policymaking.

Moreover, these findings may lend support to evidence suggesting that the value of revolving door lobbyists lies in their ability to be uniquely attuned to early developments in the policy process (see LaPira and Thomas 2017) – such as, for instance, an agency's decision to regulate or the drafting a regulatory proposal. In the agency setting, this "pre-proposal rulemaking" stage is highly shrouded; only select representatives of outside groups are invited to contribute to these ex parte (off-the-record) conversations (Potter 2019; West 2004; Yackee 2012). Thus, it may be the case that revolving door lobbyists offer their employers advance knowledge that allows them to shape policy content and debates prior to the initiation of the notice-and-comment process – perhaps negating the need for influence through public comment. Such a story is supported by our earlier descriptive findings regarding the employers of revolving door lobbyists: advocates for business, professional and trade interests employ the vast majority (84 percent) of revolvers; scholars have reported that these groups, as beneficiaries of the "status quo" policy environment, are often invited to contribute to pre-proposal rulemaking, while smaller, less-resourced advocates are often excluded (Golden 1998; Potter 2019; West 2004; Yackee 2012).

Lastly, it may be the case that policy conditions and informational content reign supreme in regulatory lobbying. Among the most consistent findings of our work are the observations that policy salience is a significant governing factor of lobbying influence and the positive and significant connection between comment length and lobbying outcomes. Together, these findings reflect the theories and findings of prevailing research in the field and, in the latter case, may suggest a story of informational quality. While comment length is a mere proxy for informational quality, it directly reflects the presence of detailed advocacy. Longer comments are costly and arduous to produce – they often incorporate original data, research, detailed legal and economic analyses, and lengthy technical justifications. Thus, it may be the case that the advocacy content itself is a far more critical factor than the insider connections and process knowledge offered by the revolver.

Robustness Checks and Alternative Explanations

Several possibilities remain. For instance, does the overall expertise or seniority of revolvers – rather than their mere presence – relate to lobbying outcomes? Does the agency response to comments — which is typically embedded in the text of final agency rules – contribute to an over-estimation of the observed effect? What about comments that sought to "kill" agency rules, rather than influence their textual content? In this section, we evaluate these, along with other, alternative explanations.

To evaluate the first set of possibilities, we evaluated several alternative model specifications. First, we estimated a set of models replicating Models 1 and 2 through the *total number* of revolving door lobbyists – rather than the proportion – controlling for the total number of lobbyists employed.[25] In both cases, the results remain consistent with those of Models 1 and 2: the employment of revolving door lobbyists – both generally and with prior experience in the federal bureaucracy – is not

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[25]See Appendix B for the corresponding regression tables.

associated with lobbying influence. Second, following LaPira and Thomas (2017), we generated an additional measure of revolving door lobbying accounting for the *expertise and seniority of revolvers* with previous work experience in the federal bureaucracy. This measure is designed to account for revolvers' degree of status and seniority in government and is operationalized through the proportion of the number of government positions held in the federal bureaucracy among revolvers with former agency employment. We then replicated Model 2 accounting for this measure.[26] In this case, too, the model results indicate a statistically insignificant relationship between greater professional status/expertise among agency revolvers and regulatory lobbying influence.

Further, the reader may be aware that federal agencies are required to publish their responses to "significant" public comments as a part of each final rule (Potter 2019; West 2004). These responses summarize the key points of the comments and describe the agency's response; in doing so, they often (tersely) articulate whether, and why, they have chosen to adopt or disregard the comment's recommendations. This communication is vital to the rulemaking process. It reinforces agencies' mandates to carefully review the public comments that they receive and establishes a written record for purposes of oversight and judicial review. However, the publication of these responses as a part of final agency rules poses a measurement concern for this work: the inclusion of the agency response – which, in some cases, provides a summary of comments' recommendations – might contribute to an over-estimation of the dependent variable. Thus, to ameliorate this concern, we manually removed the agency response section from most final rules appearing in the data (58 percent) and re-produced a constrained version of the dependent variable. In the remaining 42 percent, the agency response was interwoven within the final regulatory language (distributed across hundreds — and in some cases, thousands — of pages without ob-

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[26]See Appendix B for the corresponding regression table.

vious in-text identifiers), making it impossible to identify and remove each component of the response by hand or using automated tools.

However, within the corpus of rules from which we were able to manually remove the agency response, the correlation between the original and constrained dependent variable was 0.98, suggesting that the results presented in the previous section are not driven by the inclusion of the text of the agency response. Though it is possible that the group of rules from which we were not able to remove the agency response might differ systematically from the group from which we were able to investigate this possibility directly, we did not detect any such differences. Both sets of rules appear similar in complexity, salience, and length.

Lastly, due to the operationalization of the dependent variable, our findings do not address cases where a final rule was not issued, but where a comment sought to "kill" the rule and thus succeeded in achieving its goal. While it is certainly possible that some comments in the corpus successfully urged regulators to shelve the corresponding proposed rules, the withdrawal of proposed rules is rare, as they are slowly and carefully developed over long periods of time, typically with the consultation of outside groups (Potter 2019). This trend is reflected in the data: less than two percent of proposed rules in the data were formally withdrawn.

Regardless, this phenomenon is a form of *negative* lobbying power — lobbying against a particular policy proposal in its entirety. Since it is not possible to measure textual similarity without a final rule, these cases are excluded from the data and models presented in this paper. This condition represents an important limitation of our work. While a manual reading of the pertinent documents could allow for an analysis of these cases, it is beyond the scope of the data and analysis used in this work, which are concerned with a form of positive lobbying power — lobbying to refine, rather than eliminate, the content of a policy proposal.

Discussion

Since the late-twentieth century, the federal bureaucracy has grown substantially in stature in American politics. This trend necessitates greater attention to its procedures – and the role of outside groups in its work. Interest groups attend closely to policy implementation by federal agencies and dedicate the majority of their lobbying to the regulatory context. However, while scholars have recently begun to explore the direct connection between lobbying and agency policymaking, this area of study remains limited. The practice of revolving door lobbying – both its patterns and its efficacy – is among the most glaring gaps in our knowledge.

Our work responds to this gap by offering the first systematic empirical analysis of the efficacy of revolving door lobbying in American national politics. Overall, we find no evidence of a connection between regulatory lobbying success and the revolving door. Neither the general employment of revolving door lobbyists nor the employment of former agency employees retain a connection with interest groups' regulatory lobbying success. Moreover, even the employment of revolvers with greater status and expertise in their former agency roles has no connection to their interest group employers' lobbying influence.

These results are genuinely surprising. They contradict our hypothesized expectations and those of scholars, organizational practitioners, and political strategists. They suggest that there may be important limits on the extent to which revolving door lobbying moderates interest groups' successes in agency rulemaking. Thus, the disparate impacts of revolving door lobbying may be restricted to other settings (such as the legislative process) and may represent the exception, rather than the rule, in administrative policymaking – altogether lending greater democratic legitimacy to the oft-criticized "fourth branch" of government. In so doing, our work makes a substantial theoretical and empirical contribution.

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Appendices

A   Revolving Door Lobbyist Former Positions, Aggregated

Table 5: Revolving Door Lobbyist Positions by Former Government Employment

Former Employment	Frequency	Percent
Congressional staffer	582	63.82
Member of Congress	5	0.55
Federal agency	76	8.33
White House	220	24.12
Other federal office	29	3.18
Total	912	100%

B   Model Results

Table 6: Model 1 - Effect of Proportion of Lobbyists with Federal Employment on Lobbying Influence

	Lobbying Influence
Federal Employment	-0.1077
	(0.19)
Salience	-0.0003***
	(0.00)
Complexity	-0.1978
	(0.17)
Comment Length	0.0001***
	(0.00)
Similarity	0.0013
	(0.00)
Financial Capacity (Log)	0.0260
	(0.03)
Business	-0.0512
	(0.19)
Constant	3.8882***
	(0.68)
Obs.	610

Standard errors in parentheses

* $p < 0.05$, ** $p < 0.01$, *** $p < 0.001$

Table 7: Model 2 - Effect of Proportion of Lobbyists with Bureaucratic Experience on Lobbying Influence

	Lobbying Influence
Bureaucracy	-0.9721
	(0.66)
Salience	-0.0004***
	(0.00)
Complexity	-0.1958
	(0.18)
Comment Length	0.0001***
	(0.00)
Similarity	0.0013*
	(0.00)
Financial Capacity (Log)	0.0171
	(0.04)
Business	-0.1569
	(0.21)
Constant	4.1379***
	(0.79)
Obs.	610

Standard errors in parentheses

* $p < 0.05$, ** $p < 0.01$, *** $p < 0.001$

Table 8: Robustness Check, Effect of Federal Government Experience (Count of Lobbyists) on Lobbying Influence

	Lobbying Influence
Federal Employment (Count)	-0.0314
	(0.04)
Num. Lobbyists	0.0000
	(0.00)
Salience	-0.0003***
	(0.00)
Complexity	-0.1611
	(0.15)
Comment Length	0.0001***
	(0.00)
Similarity	0.0013*
	(0.00)
Financial Capacity (Log)	0.1016
	(0.07)
Business	-0.1615
	(0.22)
Constant	2.7288**
	(0.96)
Obs.	610

Standard errors in parentheses

* $p < 0.05$, ** $p < 0.01$, *** $p < 0.001$

Table 9: Robustness Check, Effect of Bureaucratic Experience (Count of Lobbyists) on Lobbying Influence

	Lobbying Influence
Bureaucracy	-0.0741
	(0.11)
Num. Lobbyists	-0.0001
	(0.00)
Salience	-0.0003***
	(0.00)
Complexity	-0.2319
	(0.17)
Comment Length	0.0001***
	(0.00)
Similarity	0.0012*
	(0.00)
Financial Capacity (Log)	0.0724
	(0.07)
Business	-0.1452
	(0.22)
Constant	3.3605**
	(1.04)
Obs.	529

Standard errors in parentheses

* $p < 0.05$, ** $p < 0.01$, *** $p < 0.001$

Table 10: Robustness Check, Effect of Bureaucratic Expertise (Number of Positions) Among Revolvers on Lobbying Influence

	Lobbying Influence
Bureaucracy	0.0137
	(0.04)
Num. Positions	-0.0130
	(0.01)
Salience	-0.0003***
	(0.00)
Complexity	-0.2102
	(0.15)
Comment Length	0.0001***
	(0.00)
Similarity	0.0011*
	(0.00)
Financial Capacity (Log)	0.0618
	(0.06)
Business	-0.0947
	(0.22)
Constant	3.4753***
	(0.78)
Obs.	529

Standard errors in parentheses

* $p < 0.05$, ** $p < 0.01$, *** $p < 0.001$