

Guidance for your comment

A constructive, information-rich comment that clearly communicates and supports its claims is more likely to have an impact on regulatory decision making.

Summary

- ✓ Read and understand the regulatory document you are commenting on
- ✓ Be concise but support your claims
- ✓ Base your justification on sound reasoning, scientific evidence, and/or how you will be impacted
- ✓ Address trade-offs and opposing views in your comment
- ✓ There is no minimum or maximum length for an effective comment
- ✓ The comment process is not a vote – **one well supported comment is often more influential than a thousand form letters**

Form Letters

Many in the public mistakenly believe that their submitted form letter constitutes a “vote” regarding the issues concerning them. Although public support or opposition may help guide important public policies, agencies make determinations for a proposed action based on sound reasoning and scientific evidence, not a majority of votes. A single, well-supported comment may carry more weight than a thousand form letters.

Detailed Recommendations

1. Clearly identify the issues within the regulatory action on which you are commenting. If you are commenting on a particular word, phrase or sentence, provide the page number, column, and paragraph citation from the federal register document.
2. If a rule raises many issues, do not feel obligated to comment on every one – select those issues that concern you the most, affect you the most, and/or you understand the best.
3. Although agencies receive and appreciate all comments, constructive comments (either positive or negative) are the most likely to have an influence.
4. If you disagree with a proposed action, suggest an alternative (including not regulating at all) and include an explanation and/or analysis of how the alternative might meet the same objective or be more effective.
5. The comment process is not a vote. The government is attempting to formulate the best policy, so when crafting a comment it is important that you adequately explain the reasoning behind your position.
6. Identify credentials and experience that may distinguish your comments from others. If you are commenting in an area in which you have relevant personal or professional experience (i.e., scientist, attorney, fisherman, businessman, etc.) say so.

7. Agency reviewers look for sound science and reasoning in the comments they receive. When possible, support your comment with substantive data, facts, and/or expert opinions. You may also provide personal experience in your comment, as may be appropriate. By supporting your arguments well you are more likely to influence the agency decision making.
8. Consider including examples of how the proposed rule would impact you negatively or positively.
9. Comments on the economic effects of rules that include quantitative and qualitative data are especially helpful.
10. Include the pros and cons and trade-offs of your position and explain them. Consider other points of view, and respond to them with facts and sound reasoning.