

Comments from Peter Strauss on Regulatory Analysis Recommendation

Submitted on May 21, 2012

Dear Reeve --

Hoping that this is what you mean by redline format, I'd suggest replacing the new Council text at lines 47-51,

The Conference does not, however, take any position on the appropriate number of regulatory analysis requirements or on the appropriate ⁴⁸ scope of their coverage. Rather, the Conference proposes a set of reforms designed to ensure that the existing requirements are applied in the most efficient and transparent manner possible.

as follows

In seeking to assure that existing analytic ~~The Conference does not, however, take any position on the appropriate number of regulatory analysis requirements or on the appropriate scope of their coverage. Rather, the Conference proposes a set of reforms designed to ensure that the existing~~ requirements are applied in the most efficient and transparent manner possible, the Conference does not address whether the number and nature of those requirements might not be reduced in light of their cumulative impact on agencies.

While I accept the neutrality of the recommendation on this question, the complete absence of even a suggestion that the current level of demand might be harmful is unfortunate. I hope that someone with the right to do so might offer this or a similar amendment at the plenary.

Peter