

Comment from Public Member Erika Lietzan on *Public Availability of Inoperative Agency Guidance Documents*
November 3, 2021

For my issue, recommendation 2:

Whether the policies or legal interpretations expressed in the document, though no longer operative, remain relevant to understanding the legal status of any currently regulated parties [or any parties that were regulated under the inoperative guidance and remain regulated]

Or

Whether the guidance is inoperative prospectively, but remains relevant to currently regulated parties who were also regulated when it was operative