

Comment from Special Counsel Jeffrey Lubbers on *Identifying and Reducing Burdens in Administrative Processes*
December 1, 2023

Line 2-6—This second sentence is too long and convoluted. I would put a period after “opposition” and start a new sentence on line 4. “Such proceedings also follow the exclusive-record principle in which the decision maker is confined to considering

On line 8—I would not say “regulated” and would substitute “also covered” [The reason is that the APA doesn’t “regulate” in the same way we usually use that word.]

On line 9—I would also use “covered” instead of “regulated”

On line 46—The sentence beginning with “Agencies” on page 45 might read better if “that lack” on line 46 is replaced by “without”