

Comment from Senior Fellow Lon B. Smith on *Mass, Computer-Generated, and Fraudulent Comments*
May 17, 2021

Title

- Change: Mass, Computer-Generated, and Fraudulent Comments
- To: Managing Mass, Computer-Generated, and Fraudulent Comments

This is consistent with the subtitles in the recommendation.

Lines 105 to 106

- Change: comments online, they should provide clear notice of their actions and any process for verifying the receipt of individual comments or locating identical comments in the
- To: comments online, they should provide clear notice of their actions and notice of whether they have any process for verifying the receipt of individual comments or locating identical comments in the

Do we want the agency to provide more than notice of the existence of the process?

Lines 111 to 113

- Change: accounts for the number of identical or nearly identical comments and that the agency provides an opportunity for interested members of the public to obtain or access all the comments received.
- To: accounts for the number of identical or nearly identical comments. If resources permit, the agency should also consider providing an opportunity for interested members of the public to obtain or access all the comments received.

This is a good idea, but implementation will depend on the agency's funding and staffing.

Lines 122 to 125 – recommendation 5

- A comment is either anonymous, malattributed, or correctly attributed to a human. If anonymous the agency can't notify the submitter because it won't have the submitter's name. If malattributed, contacting the real submitter is addressed in recommendation #9.

If correctly attributed to an actual human, what's the problem? These lines seem to be unnecessary.

- What am I missing here?

Line 136

- Strike the word “potentially.”

Doesn't it make sense to always provide this opportunity after the comment period? An agency should always want the public to note any malattributed comments. The word “potentially” doesn't seem to add anything.

Lon Smith