

Comment from Senior Fellow Nina A. Mendelson on *Mass, Computer-Generated, and Fraudulent Comments* (draft circulated May 7, 2021).

Thank you for the opportunity to comment on the draft recommendation in advance of the May 11, 2021, committee meeting. The draft responds very helpfully to the issues raised in the last committee meeting and usefully distinguishes among mass comments, malattributed, and computer-generated comments.

The following comments on the draft recommendation are quite minor and aimed mainly at clarifying the language.

Lines 22-23: This sentence defining mass comments is unclear. As the recommendation later makes clear, the key characteristic of mass comments is that they are submitted in large volumes. They also often include the submission of a large number of identical or nearly identical comments. I suggest the following instead of the language beginning “submitted by” through the end of the sentence: “submitted in large volumes by members of the public, including the organized submission of identical or nearly identical comments.”

Lines 36-37: This sentence is repetitive of the sentence on lines 32-33. This sentence could be deleted.

Lines 37-39: The processing challenges come from the volume of mass comments. Identical content probably makes those large volumes easier to handle because less individual analysis is required. But not all mass comments are identical or nearly identical. Some simply aren’t identical, and even when sets of identical comments are filed, there may be numerous such sets. The sentence should be clarified starting with “result of . . .” “... result of the volume as well as the identical or nearly identical content of some comments.”

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