

Comment from Special Council Jeffrey Lubbers on *Automated Legal Guidance*
June 8, 2022

I have four suggested amendments to the proposed recommendation:

1. In footnote 2, the agencies are listed in a random way. Why not put them in alphabetical order? I would also use either "the Department of the Army" or the "United States Army" instead of just "the Army." I also note that the only agency on the list that doesn't have "the" in front of it is United States Citizenship and Immigration Services.
2. In the spirit of plain language, in recommendation 10, on line 75, I would replace "utilize the automated legal guidance tools" with "use these tools"
3. In recommendation 14, at the end, I believe you meant to add "is included."
4. In recommendation 19, I would add at the beginning "When feasible, agencies..." My reason for suggesting this (I realize that feasibility is an implied condition for many of them) is that this requirement might discourage agencies from using these tools, and the report doesn't even give one example of an agency that does this now.

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