

Comment from Special Counsel Jeff Lubbers on *Improving Notice of Regulatory Changes*
June 8, 2020

I have three proposed changes. I think the first two are stylistic and could be accepted as manager's amendments:

1. In footnote 5, instead of "does not refer to"-- substitute "is not limited to"
2. Recommendation 1a seems awkward. I would use the same language used in #2--"Identify persons who may be interested in the agency's significant regulatory changes"---(you could also add "or affected by" after "interested in")
3. Recommendation 4--I would add "--consistent with the Paperwork Reduction Act." at the end.

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