

Comment from Liaison Representative Thomas M. Sussman (ABA Administrative Law and Regulatory Practice Section)

July 30, 2020

In Appendix D of the draft report (page 123), fourth paragraph, line 1, should the agency really reserve the right to redact "in full"? If that has to be an option, the agency should post a summary of the submission. I don't favor completely nonpublic submissions.

Finally, in the last paragraph of page 124, the paragraph addresses PII, but says "Your comment will be kept confidential . . . ." Why can't the comment be posted without the PII. Plus, I don't understand placing PII information in the public file but not posted. Will it be subject to inspection or release under FOIA? If not, why not just post the redacted comment?

I look forward to our meeting next week.

Tom