

Comment from David Rostker (David.Rostker@sba.gov)
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Here's proposed edits to address my comments below (plus two other items)

- I've pulled different references for the OMB Memorandum amendment. The Bush-era OMB Bulletin directly addressed publication on an agency website, so it's a stronger reference. I leave the most recent Memorandum as a "see also," even though I still do not believe that it is relevant to the recommendation.
- I suggest a reference to a House bill, just passed out the House Small Business committee on a bipartisan basis, which would require the National Ombudsman to create a single website for all small entity compliance guides.
- I suggest a change to Recommendation 8 to deal with labelling of revised or obsolete guidance, discussed below.
- I suggest language to minimize the reliance on particular technologies to communicate desired results.
- I suggest minor changes to Recommendation 12 and 13 for organizational purposes and for clarity. As I see it, publication in the FR is simply another affirmative step to inform the public contemporaneously where publication in the CFR is more closely associated with when the public might need it.

I welcome friendly amendments to hone the wordings. Thanks for considering these suggestions.

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