

Comment from Special Council Jeffrey S. Lubbers on *Improving Timeliness in Agency Adjudication*
December 1, 2023

On line 7—I would change “given the added time of possible judicial review” to “given the possible added time of judicial review.”

On line 39—I stumbled over the term “personnel management *devices*” I know it’s the term used in the heading of paragraph 1 of 86-7, but in this day and age it sounds like a robot or some sort of embedded chip. I would suggest using “techniques” or “strategies” instead.

Lines 119-120—Paragraph 5 refers to “earliest possible level”—I think that should be “earliest possible stage” and “stage” should also replace “level” on line 120. If for some reason you prefer "level," it should probably be “lowest”—but I think “stage is preferable.

On line 129—I would replace “listed” with “described” [there’s no list in paragraphs 5 and 6]