

Comment from Special Counsel Jeffrey S. Lubbers on Rules on Rulemakings  
December 14, 2020

I assume that footnote 19 will be updated with a cross-reference to the pending recommendation if it is approved.

Lines 22 and 65, I would omit the word “daily.” The *Federal Register* is actually only published on working days, and most people know what it is. Also, we refer to it in many recommendations (including the one on Agency Appellate Systems) without adding it.

In the appendix (d)(1), how about “pertaining to” rather than “respecting”