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Subject: MAR 100 (A)

Body: i see no substantive change between the old term in the 93 rules of 'formal adjudications' and the new term used. the old term referred to all trial type hearings whether or not conducted pursuant to the apa, and whether or not presided over by an alj. To change the term to the less formal, but maintain the same definition seems pointless. formal adjudication means what it is defined as, not what someone decides the term is synonymous with and there fore is a pointless change which seems to decrease the importance of the adjudications undertaken by the agency hearings these model rules are meant to cover. this is not a positive change.