

1600 20th Street, NW
Washington, DC 20009
202-588-1000

June 1, 2012

Hon. Cass R. Sunstein, Administrator
Office of Information and Regulatory Affairs
Office of Management and Budget
Washington, DC 20503

Re: Request for Information 2012-7602, 77 FR 19357

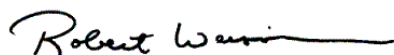
Dear Mr. Sunstein:

We believe it is imperative that the law be readily accessible for all to read and use. That is a central requirement of our democratic system. Accordingly, we strongly agree that standards incorporated by reference into federal regulations should be widely available to the public, without charge, and that such standards should be deemed in the public domain rather than subject to copyright restrictions.

Collectively, our organizations work on a range of public policy issues, including health, safety, consumer protection, the environment, open government, and civil rights. Allowing free access to standards incorporated by reference will strengthen the capacity of organizations like ours to engage in rulemaking processes, analyze issues, and work for solutions to public policy challenges. Such open access to standards will help protect public safety, promote economic opportunity, increase access to justice, and strengthen citizen participation in our democracy.

We ask the Administration to implement reforms that make standards incorporated by reference in proposed rules and in final rules available for free on the Internet.

Sincerely,



Robert Weissman
President
Public Citizen

On behalf of:

AFL-CIO

AFSCME

American Association of Law Libraries

Association of Research Libraries
Center for Auto Safety
Center for Media and Democracy
Citizens for Responsibility and Ethics in Washington (CREW)
Community Research
Consumer Action
Defending Dissent Foundation
Electronic Frontier Foundation
Essential Information
Food and Water Watch
Knowledge Ecology International
National Council for Occupational Safety and Health
National Women's Health Network
OMB Watch
OpenTheGovernment.org
Project on Government Oversight (POGO)
Public Employees for Environmental Responsibility (PEER)
Public.Resource.Org
Sierra Club
Sugar Law Center for Economic and Social Justice
Sunlight Foundation
US PIRG
United Steelworkers