

We are requesting comments on the following issues:

1. Does “reasonably available”

a. Mean that the material should be available:

For free and To anyone online? **Yes**

b. Create a digital divide by excluding people without Internet access?

**No. Print copies should still be available.**

2. Does “class of persons affected” need to be defined? If so, how should it be defined? **No. The language is not necessary. Insights and improvements to laws can originate from all classes of people**

3. Should agencies bear the cost of making the material available for free online? **Yes. This cost should be so low as to be irrelevant. There is no doubt that the documents already exist in digital form, as well as the web sites.**

4. How would this impact agencies budget and infrastructure, for example? **Not sure**

5. How would OFR review of proposed rules for IBR impact agency rulemaking and policy, given the additional time and possibility of denial of an IBR approval request at the final rule stage of the rulemaking? **I don't see the additional time as necessary. These rules are periodically updated.**

6. Should OFR have the authority to deny IBR approval requests if the material is not available online for free? **Yes**

7. The Administrative Conference of the United States recently issued a Recommendation on IBR. [77 FR 2257](#) (January 17, 2012). In light of this recommendation, should we update our guidance on this topic instead of amending our regulations? **With the amount of money involved, guidance would seem to be insufficient motivation to affect the change.**

8. Given that the petition raises policy rather than procedural issues, would the Office of Management and Budget be better placed to determine reasonable availability? **Don't know**

9. How would an extended IBR review period at both the proposed rule and final rule stages impact agencies? **I don't see the extension as necessary. These rules are periodically updated.**

Thanks, Tom

Tom Bledsoe  
Project Engineer