

Hi Amy and Miriam,

We at [Advection.NET](http://www.advection.net), a streaming video services provider and content delivery network (CDN), fully support the petition to revise the regulations at 1 CFR part 51 to make the full body and text of law more reasonably available.

We believe that the first duty of the patriotic citizen is to be informed, and in the age of Wikipedia, we further believe *all* law should be easily and readily accessible to the public, for free. The notion that this creates a "digital divide" is a straw man, as Internet access is available, for free, to every citizen, typically through the local library.

As a CDN, we know the costs of publishing information, and it's clear that the cost and burden of publishing materials online is infinitesimal compared to the public good achieved by providing citizens the information and knowledge of the laws they may be held accountable to.

The 3500 sheets of public safety standards recently discussed by [public.resource.org](http://public.resource.org) amount to only 200 megabytes of data if presented in PDF form[1], or 60 megabytes in word processing form. For that matter, the entire US Code of Laws would be only 10 gigabytes in PDF form, small enough to fit on a memory stick keychain, while amounting to 82 boxes of paper. At our CDN prices, storing the entire US Code amounts to about \$2.50 a month in storage costs, and about 1 cent for each citizen downloading the mentioned 3500 pages of public safety standards.

We believe federal and local government bodies should be responsible for publishing any laws they have passed, including all IBR rules or standards. Even the US Congress doesn't pass more law than could be reasonably scanned by a single Fujitsu ScanSnap, retailing for under \$500 and which readily creates full text searchable PDFs from stacks of printed pages. This shows e-publishing is within the means of even the smallest legislative body. The storage and delivery costs are so minimal, there would be no meaningful impact to the budget or infrastructure of any agency, other than the time and training of persons responsible for posting the latest laws and regulations. Cornell's Legal Information Institute has demonstrated the ability to publish US Code, US Supreme Court opinions, UCC, US Code of Federal Regulations, and more, cost effectively. Through providing such materials to the tune of some six million page views a week, LII can readily attest to the budget impact.

As the entire purpose of publishing laws is to allow citizens to freely understand the rules they are governed by, we believe all IBR texts must be published in context (e.g., as addenda to the laws incorporating them by reference), regardless of the texts' availability or costs elsewhere.

Thank you for your time and consideration of this petition. If [Advection.NET](http://www.advection.net) can be of any assistance in planning or distributing these materials, please let us know.

Sincerely,

Michael Terretta  
Co-Founder, [Advection.NET](http://www.advection.net)  
<http://www.advection.net/>

1. Simple "pages per megabyte" calculator for e-discovery: <http://www.lexbe.com/hp/Pages-Megabyte-Gigabyte.aspx>