

My comments on the proposed rule:

1. Reasonably available should mean online, for free. There is no digital divide - if all the regulations are available online for free then any private person can transfer it to DVD , CD, or other removable media or even paper and provide it to people without Internet access. Or citizens could use a free Internet connection at their local library to read the regulations.

2. All citizens are adversely affected by the existence of federal law which they cannot access.

3. The federal government already has a multitude of online portals through which the files can be made available for only the cost of disk storage, which is very cheap. Furthermore , all modern publishing starts with digital documents. Therefore the process should NOT be to waste money scanning in printed documents, but to require publishers to submit a digital copy to be published online. That cost should be controlled by creating - once - an automated submission system and review should be assigned as an additional duty to clerks already employed. If necessary, levy an online publication tax on organizations that have been raising money through sales of federal regulations - judging by the CEO salaries of just a handful of "major players" alone they could easily fund any government expense in this area.

4. Individual agencies should not publish the regulations on their own. All regulations should be published at a central repository (that can then be mirrored in standard online fashion to prevent single point of failure and overwhelming traffic). Agencies can maintain links to documents in the repository on their individual websites with no additional cost compared to what they are doing now .

5. All documents in the repository should be named according to their status in typical Internet fashion: The filename should include the document subject (such as housing, construction, manufacturing, etc), originator (such as UL), tags (such as an OFR control number) , and include the word "draft" in the file name to indicate the file contains proposed regulations that have not yet been accepted , include "revision-123" in the file name to indicate this is the 123rd revision of this document, include "enacted-20120501" to indicate it was enacted into law (including IBR) on may 1st, 2012. That would also facilitate a search for laws enacted on may 1st 2012 to find the one that IBR'd the document. If a draft document is rejected outright a subsequent numbered revision can be uploaded to contain header text like "draft was rejected". Previously uploaded documents should be redirected to most current version (draft, enacted, or rejected)

6. The approval process must include a digital copy of the material - otherwise how can it be approved?
The OFR approval process must require a digital copy and the OFR must upload that copy to the central repository into an appropriate folder with an appropriate file name as discussed above.

7. The recommendation cited explicitly does not take a position on the copyright status of standards IBR. The regulation must be changed to make explicit the fact that all law, when enacted , becomes a part of the public domain. Furthermore, all drafts submitted for approval must also be in the public domain in order to facilitate the lawmaking process. It should be te OFR, policy that Any work submitted for approval with a copyright notice must be rejected .

8. The OFR is the appropriate agency to make the needed changes.

9. Making the documents available online should not cause any review period to be extended. Any such extension must be for another reason and I don't have a comment on that.

Many thanks for your attention,

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