

I am a layman in both law and federal administrative matters. As a citizen, however, I am convinced by the way Strauss argues for changes in the status of IBR regulations written by, among others, private voluntary standards organizations.

It seems clear that there is no longer a sensible rationale for making citizens pay extra fees to see the laws that they must follow. I agree wholeheartedly with the petition's arguments for redefining "reasonably available."

"Reasonably available" should mean "for free, to anyone online." I could see a rationale for limiting access to those in the US, but frankly I imagine that would only add a layer of expense for very little benefit.

I do not think worries about a "digital divide" should bear much weight. Citizens too poor for an internet connection and without recourse to internet connections in libraries, schools, or elsewhere, would likely be too poor to buy access to IBR materials anyway. That is an unfortunate state of affairs but not one particularly relevant to the question of whether to adopt the proposed changes.

As for questions about the added expense of making regulations available online: the business model does, sadly, need to change. Agencies will need added funding to make IBR materials available, and the organizations that now make money from selling IBR standards may need to be compensated in other ways.

Regarding other technical questions of defining classes, funding models and so forth: as I said, I am a layman in these matters. I simply wish to register my strong support for the proposed changes, changes that would be important steps toward truly open government.

Sincerely,

Mark Gardiner