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January 31, 2014

Ms. Amy Bunk
Director of Legal Affairs and Policy
Office of the Federal Register
800 North Capitol Street, N.W., Suite 700 Washington, D.C. 20001

Re: Comments on NPRM, Incorporation By Reference, Docket Number: OFR-13-0001

Dear Ms. Bunk:

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 believe 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 Office of the Federal Register to issue a final rule that goes beyond the NPRM and requires that standards incorporated by reference in proposed rules and in final rules be available for free on the Internet.

Sincerely,

A handwritten signature in black ink that reads "Robert Weissman". The signature is fluid and cursive, with a long horizontal stroke at the end.

Robert Weissman
President
Public Citizen



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On behalf of:

American Association of Law Libraries

AFL-CIO

AFSCME

Association of Research Libraries

Center for Digital Democracy

Center for Effective Government

Center for Media and Democracy

Citizens' Environmental Coalition

Electronic Frontier Foundation

Essential Information

Institute for Agriculture and Trade Policy

National Consumers League

National Employment Law Project

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