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# A GUIDE TO WRITING PUBLIC COMMENTS

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EXAMPLE 1<sup>i</sup> (THIS DOCUMENT USES AN ENDNOTE REFERENCING SYSTEM)

“The key to a successful comment is not just to point out failures ..., but to convince an agency ... that a proposed regulation should be adopted, changed, or dropped.”

Writing a public comment is an act of persuasion. You must persuade your future readers that your comments can and should be actioned. In order to do this, you should employ all three dimensions of an effective argument: ethos (argument by character), logos (argument by logic) and pathos (argument by emotion but not emotional argument)<sup>ii</sup>. This guide will illustrate how these three dimensions of a complete argument are realized in public comments.

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## THE INTRODUCTION

Your first goal in a public comment is to persuade your readers that they should listen to you. This is argument by character (ethos) and is most commonly achieved by introducing your credentials.<sup>iii</sup> Consider this example of an introduction to a public comment on an environmental policy issue:

EXAMPLE 2<sup>iv</sup>

Thank you for the opportunity to comment on this proposed rule. The Union of Concerned Scientists (UCS) is the nation’s leading science-based nonprofit putting rigorous, independent science to work to solve our planet’s most pressing problems. On behalf of UCS’s more than 500,000 supporters, and network of more than 21,000 scientists, engineers, and public health professionals, we are pleased to provide comments on EPA Docket No. EPA-HQ-OAR-2017-0091.

The writer here puts a great deal of weight behind the comment by informing the reader that the opinions to be given are those of a huge range of professionals. A personal introduction might sound something like this:

***“My name is Dr John Smith, and I am a professor and researcher in the field of AI at the National Graduate Institute of Policy Studies (GRIPS). Having written a number of books and peer-reviewed articles on the topic of AI, I am pleased to offer comments on the AI Governance Guidelines for Implementation of AI Principles Ver. 1.0”***

Do not underestimate the importance of establishing your competence to comment on a specific policy or government regulation. Arguably, failure to establish yourself as someone who should be listened to may undermine your efforts to effect change.

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## THE BODY

Your readers will almost certainly be busy people who have many public comments such as yours to read. They may not have the time nor the inclination to search through your comment for your main points and recommendations. For that reason, it is a good idea to present your main points up front and save detailed analyses until later in the body section.<sup>v</sup> One strategy that can be used here is formatting your main point in bold.<sup>vi</sup>

*Stifling of Innovation in AI in Japan: Adoption of the proposed guidelines XIID would immediately result in additional obstacles to AI research and prevent many innovations in the field. It is recommended that XIID be revised to ensure it is in keeping with international standards, particularly in regard to ...*

EXAMPLE 3<sup>vii</sup>

Thank you for the opportunity to provide comments to the California Department of Pesticide Regulation (DPR) on its draft regulation, DPR 16-004. We commend DPR for its efforts to decrease exposure to toxic pesticides among California's children and women and men working at schools and child day care facilities. However, DPR's proposed regulation falls short of its intention in several critical ways. To meet its important public health goal of reducing health risks of drift prone pesticide applications DPR should: **require buffer zones be at least one-mile wide, be in place 24 hours per day every day, and allow counties to retain full authority to adopt stricter requirements based on local conditions.** [Bolding in Original]

Having summarized your main points, you should then move on to support these opinions with evidence (logos). It is wise to add citations to your detailed explanations; however, as this is not an academic paper, less intrusive citation styles that use footnotes and endnotes are preferred to in-text citation systems such as APA. This preference for less intrusive citations systems is indicative of the fact that a public comment is not an academic document. You primary readers (staff of government agencies and ministries) may not necessarily be experts in your field. For that reason, try to keep your language simple and clear and avoid excessive use of acronyms and jargon.<sup>viii</sup> Also, remember that your secondary readers include other citizens who will read your comment if it is published by the agency or ministry.

Providing relevant evidence in a simple format will not only enable your primary and secondary readers to understand your opinion, but it will also help your primary reader to make a case for following your suggestions to decisionmakers. This is especially true if you have access to evidence that the original writers of the guidelines did not or evidence that you believe has been overlooked. Such evidence boosts your ethos as well as strengthening your logos.<sup>ix</sup>

EXAMPLE 4<sup>x</sup>

My name is John Kruse and I represent the economic analysis firm WAEES that provides scenario analysis to the agricultural and biofuels industries using our global partial equilibrium agriculture and biofuels model. My comments are highlights from this ongoing modeling effort.

Once you have identified an area for improvement in a guideline or regulation, you can encourage your reader into action by suggesting the next step to solve the problem. Providing realistic solutions to the issues identified makes it that much easier for your comments to be taken into account and for the change you are seeking to become a reality. Be sure to suggest actions that are within the power of the government agency or ministry.<sup>xi</sup> Also bear in mind that some arguments will be more persuasive than others. For example, a regulatory scholar from the Mercatus Center at George Mason University found that comments based on economic arguments were more than twice as likely to elicit agreement from agencies than comments related to the legality of a regulation.<sup>xii</sup>

Finally, if you would like to suggest a change in the wording of a guideline or regulation, suggest the language you would like to see included. Often these suggestions will be accepted or accepted with minor changes (see an example of this in the *Extract From a Model Public Comment* later in this guide).

Another way to boost the persuasiveness of your argument is to tap into the professional pride of the primary reader (pathos) by complementing their work and aligning your suggestions with the mission statements of the agency or ministry.<sup>xiii</sup> This strategy also boosts your ethos. Remember that ethos is the reason why your readers should listen to you. This reason could be your credentials; however, it could also be the fact that you share your readers' values. In short, your readers are much more likely to heed the advice of ally than that of an adversary.

#### EXAMPLE 5<sup>xiv</sup>

First, thank you for all the work your team does on the Renewable Fuel Standard and keeping it an important part of the US agricultural economy as well as reducing carbon emissions.

#### EXAMPLE 6<sup>xv</sup>

To meet its important public health goal of reducing health risks of drift prone pesticide applications DPR should: **require buffer zones be at least one-mile wide, be in place 24 hours per day every day, and allow counties to retain full authority to adopt stricter requirements based on local conditions.**

Some ways to boost the clarity of this section are as follows:

- Always clearly state the guideline or regulation that you are commenting on.
- Clarify if you are agreeing or disagreeing with the guideline or regulation.
- Support your opinions with specific examples and/or evidence and cite that evidence.
- Be very clear what actions you would like taken: adopt, change, or drop.

There is no need for you to comment on every aspect of the proposed regulation or guidelines.<sup>xvi</sup> You can make some general statements of agreement with the main points of the regulation or guidelines, but for the most part restrict your comments to points where you can make a unique contribution.

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## THE CONCLUSION

Summarize your main points and key recommendations again in long comments. This section will have a lot in common with the first section in the body of your paper. Make sure that the recommendations match those mentioned in the body of the paper.<sup>xvii</sup> However, a summary of each point may not be necessary in short comments as it may constitute needless repetition. In this case, you can summarize your position and overall message.

#### EXAMPLE 7<sup>xviii</sup>

I support the Clean Power Plan because it sets common sense limits on carbon emissions from power plants and positions the United States to be a leader in the rapidly growing clean energy marketplace. By moving to repeal the Clean Power Plan, the EPA is undermining vital health protections that help address climate change. We need the EPA to strengthen safeguards that address climate change, not tear them down. I am calling on your agency to factor in the real costs associated with carbon emissions and choose the health and safety of the public over the interests of the fossil fuel industry.

# EXTRACT FROM A MODEL PUBLIC COMMENT

EXAMPLE 8<sup>xix</sup>

Below is an extract from a model public comment that illustrates many of the points discussed in this guide.

March 12, 2020

To:

Dominic J. Mancini

Acting Administrator

Office of Information and Regulatory Affairs

Office of Management and Budget

*RE: Draft Memorandum to the Heads of Executive Departments and Agencies, Guidance for Regulation of Artificial Intelligence Applications*

Dear Mr. Mancini,

On behalf of the Center for Human-Compatible Artificial Intelligence, the Future of Life Institute, the Center for Long-Term Cybersecurity, and The Future Society, we are pleased to submit comments in response to the “Draft Memorandum to the Heads of Executive Departments and Agencies, Guidance for Regulation of Artificial Intelligence Application” (henceforth the AI Memorandum). Our organizations have collaborated on this response in order to leverage diverse expertise and to highlight the consensus of our remarks...

## **1. On the Scope of the Principles**

The scope of the draft Memorandum as currently written excludes what is described as “strong” or “general” AI. While it is reasonable to differentiate between “weak” and “strong” AI systems, and to focus on the former in this Memorandum, it is also important to remember that there is no sharp demarcation between steadily more powerful AI systems and eventual “strong” or “general” AI. As Principle 6 of the Memorandum, ‘Flexibility’, prudently states, “AI will evolve” and “agencies should pursue performance-based and flexible approaches that can adapt to rapid changes and updates to AI applications.”<sup>1</sup> The draft Memorandum is wise to develop guidelines that promote AI innovation and that will continue to be relevant into the future.

While “strong” AI may fall beyond the scope of the Memorandum’s principles, **we highly recommend that federal agencies consider the possibility of “strong” AI as they evaluate regulatory and non-regulatory actions.** Indeed, federal agencies would be remiss to ignore explicit attempts to develop highly advanced AI systems, such as the “Third Wave” AI technologies being developed under the DARPA AI Next Campaign. Though it is true that “strong” or “general” AI remains theoretical at this time, there is growing scientific consensus about the possibility of such systems, albeit with uncertain timelines and characteristics.<sup>2</sup> Thus, it is critical that federal agencies acknowledge this growing consensus, so as to shape the most forward-leaning and flexible governance possible.

*Continued...*

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# EXTRACT FROM A MODEL PUBLIC COMMENT

With this practical orientation in mind, we find part of the current description of “strong” or “general” AI to be misleading of the characteristics that these systems may exhibit. **We recommend striking the part of the description stating, “may exhibit sentience or consciousness,” and believe the sentence functions well without it.** There is significant disagreement among AI researchers about whether sentience or consciousness is necessary to achieve “strong” or “general” AI as described in the remainder of that paragraph, and its prominent inclusion in the Memorandum has the effect of making efforts to develop “strong” or “general” AI appear more far-fetched than they may be in reality.

## 2. Public Trust in AI

We commend the inclusion of Public Trust as the first principle for agencies considering ways to reduce barriers to the development and adoption of AI technologies. However, the current 2/10 principle does not emphasize enough the importance of public trust as an enabler of American competitiveness in the long-run. It also does not make clear enough the potential cost of accidents for the industries using AI.

In case of accidents or failures of AI systems, the development of several industries could be hindered because of the loss of public trust. This has happened before. The Three Mile Island Nuclear Accident in 1979 inhibited the development of the U.S. nuclear power industry for 30 years. As a result, the U.S. lost its competitive advantage in nuclear engineering.<sup>3</sup> Assuming public trust without careful consideration led to public rejection. A similar loss of public trust occurred with genetically modified organisms (GMOs) in Europe in the 1990s, with lasting consequences. Conversely, the aviation industry is overwhelmingly trusted, notably because of robust safety certification processes, and, in case of accidents, robust and publicly visible processes of accident investigation.<sup>4</sup>

**We highly recommend adding clarifying language as follows:**

### - In the sentence:

“At the same time, AI applications could pose risks to privacy, individual rights, autonomy, and civil liberties that must be carefully assessed and appropriately addressed.”

... add “public health, security and safety”:

“At the same time, AI applications could pose risks to privacy, individual rights, autonomy, civil liberties, **public health, security and safety** that must be carefully assessed and appropriately addressed.”

**- Strengthen the language regarding the importance of public trust for American competitiveness with additional statements, such as the following:**

*Continued...*

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# EXTRACT FROM A MODEL PUBLIC COMMENT

“Its continued adoption and acceptance will depend significantly on public trust and validation. **Public trust built on sound regulation contributes to American competitiveness in the sector of AI technology. Accidents can hinder the development of industries powered by AI.** It is therefore important that the government’s regulatory and non-regulatory approaches to AI promote reliable, robust, and trustworthy AI applications, which will contribute to public trust in AI. **Robust and publicly visible processes of accident investigation may be undertaken to reinforce public trust in an industry.** The appropriate regulatory or non-regulatory response to privacy and other risks must necessarily depend on the nature of the risk presented and the appropriate mitigations.”

<sup>1</sup> Office of Management and Budget. (2020). Guidance for Regulation of Artificial Intelligence Applications (DRAFT), p. 5.

<sup>4</sup> Winfield, A., & Jirotko, M. (2018). Ethical governance is essential to building trust in robotics and artificial intelligence systems. *Philosophical transactions. Series A, Mathematical, physical, and engineering sciences*, 376(2133).

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## USEFUL LINKS

### THE PUBLIC COMMENT PROJECT

- The Public Comment Project is an extremely useful resource. It provides tips for writing public comments, examples of good public comments that have been made on various topics, and examples of bad public comments. Many of the examples presented in this guide were accessed through this invaluable resource. <https://publiccommentproject.org/>

### MIT TIPS FOR WRITING PUBLIC COMMENTS

- This is a short list of helpful tips for writing public comments prepared by the communication lab at MIT <https://mitcommlab.mit.edu/eecs/commkit/public-comment-on-pending-regulation/>

### EU “HAVE YOUR SAY” PUBLIC COMMENT SITE

- The European Union encourages citizens of its member states to comment on EU rules and regulations. Unlike some other public comment forum, the EU site actively invites citizens to comment on how proposed regulations impact their daily lives. [https://ec.europa.eu/info/law/better-regulation/have-your-say\\_en](https://ec.europa.eu/info/law/better-regulation/have-your-say_en)

### THE UNITED STATES PUBLIC COMMENT PORTAL

- The public comment portal of the United States has a wealth of examples of effective, professionally written public comments and many bad example, too!. <https://www.regulations.gov/>

### RESOURCES AVAILABLE AT GRIPS: HOW TO WRITE IN ECONOMICS AND PUBLIC POLICY & THE CPC WEBSITE

- An excellent resource for writers in public policy and economics is the book by Katerina Petchko. Petchko, K. (2018). *How to write about economics and public policy*. Academic Press.
- The Center for Professional Communication (CPC) website has many useful resources for students and public policy professionals <http://www3.grips.ac.jp/~CPC/>

## LANGUAGE FOR THE INTRODUCTION – SUMMARIZING YOUR OPINION

If you are writing as an individual, it is perfectly acceptable to use “I” in the public comment. If you feel that too many of your sentences are beginning with “I,” you can use some passive sentences from time to time; however, passive sentences reduce the clarity of your writing and should be used in moderation.

### STRONG OPINIONS

- ☐ I firmly/strongly/sincerely believe that . . .
- ☐ I am absolutely convinced that . . .
- ☐ It's my belief that . . .
- ☐ It's quite clear (to me) that . . .
- ☐ I'm certain that...
- ☐ It's my considered opinion that...

### SOFT OPINIONS

- ☐ It seems to me that . . .
- ☐ I would say that . . .
- ☐ As far as I'm able to judge . . .
- ☐ I think it might/would be fair to say that . . .

### STRONG SUPPORT

- ☐ I am fully in favor of . . .
- ☐ This proposal has my full support.
- ☐ I can thoroughly/completely recommend that . . .
- ☐ I should like to express my total/wholehearted support for this . . .
- ☐ I wholeheartedly agree with . . .
- ☐ I completely/entirely agree with . . .
- ☐ I entirely approve of . . .

### STANDARD SUPPORT

- ☐ I am in favor of . . .
- ☐ I would certainly give my backing to . . .
- ☐ I would certainly give my support to . . .
- ☐ I would certainly approve of such a proposal.
- ☐ I would certainly endorse such a proposal.
- ☐ I see no objection to ...
- ☐ I have no objection to ...
- ☐ I would not be opposed to ...

### PARTIAL SUPPORT

- ☐ My initial reaction is favorable, but . . .
- ☐ With certain reservations, I would support your proposal.
- ☐ I would support your proposal with the caveat that . . .
- ☐ My support would be conditional upon . . . [your (do)ing something]

### STRONG OPPOSITION

- ☐ I am totally opposed to the proposal.
- ☐ I am completely opposed to the proposal.
- ☐ I am wholly opposed to the proposal.
- ☐ I am definitely opposed to the proposal.
- ☐ I see no good reason for supporting the proposal.
- ☐ I see no real reason for supporting the proposal.
- ☐ I see no valid reason for supporting the proposal.
- ☐ I'm afraid this proposal leaves a great deal to be desired.

### STANDARD OPPOSITION

- ☐ I am opposed to the proposal.
- ☐ I'm afraid I can't support the proposal.
- ☐ Without substantial changes, I cannot give the proposal my support.
- ☐ Without considerable changes, I cannot support this.
- ☐ Without significant changes, I would not support this proposal.

### SOFTER OPPOSITION

- ☐ I can see many problems in adopting this.
- ☐ I can see certain problems going ahead with this proposal.
- ☐ I can see some problems that would give me pause.
- ☐ I'm not sure the proposal is feasible.
- ☐ This proposal is likely to present difficulties.
- ☐ I'm not convinced that this proposal is really worthwhile.
- ☐ I shouldn't like you to think that I'm necessarily against this in any way, but I can't help wondering . . .
- ☐ I would support your proposal with the caveat that . . .
- ☐ My support would be conditional upon . . . [your (do)ing something]



## LANGUAGE FOR THE BODY – SUPPORTING YOUR OPINION

### REALLY IMPORTANT

- ☐ I particularly want to emphasize/highlight/underline/stress the fact that ...
- ☐ It is essential/imperative to realize that ...
- ☐ I feel this is a vital/crucial issue.
- ☐ I consider this point of the utmost/greatest importance.

### NEUTRAL VIEWS

- ☐ I attach considerable importance to ...
- ☐ Allow me to emphasize at this juncture that ...
- ☐ We mustn't underestimate the importance of ...
- ☐ It is worth noting that ...
- ☐ We cannot stress enough the importance of ...
- ☐ Let me say again how much importance I attach to ...

### TENTATIVE VIEWS

- ☐ I would like to remind you that ...
- ☐ I wish to draw your attention to ...
- ☐ We cannot overlook the fact that ...
- ☐ I believe this warrants further consideration.

### PLAYING DOWN A POINT

- ☐ These are minor issues when one considers ...
- ☐ But this is only of secondary importance.
- ☐ But this is, after all, a relatively small point.
- ☐ I'm afraid I regard that as of relatively minor significance.
- ☐ I'm afraid I'm not totally convinced of the importance of ...

### CERTAIN

- ☐ I'm certain/sure/convinced that ...
- ☐ It's certain/obvious that ...
- ☐ There's no doubt/question that ...
- ☐ Without doubt/question, ...
- ☐ Undoubtedly, ...

### PROBABLE

- ☐ I'm almost/virtually certain that ...
- ☐ It's highly/very probable that ...
- ☐ It's quite likely/probable that ...

### POSSIBLE

- ☐ This could well ...
- ☐ This might well ...
- ☐ This may well ...
- ☐ It's possible that ...
- ☐ It's not out of the question that ...
- ☐ It's not impossible that ...
- ☐ I think there is every possibility that ...

### UNLIKELY

- ☐ It is highly/most improbable that ...
- ☐ It is highly/extremely/very/most unlikely that ...
- ☐ There's very little likelihood/probability of ...

### UNCERTAIN

- ☐ I'm not certain/sure/convinced that ...
- ☐ I have doubts about ...
- ☐ I doubt if/whether ...
- ☐ There is some doubt as to whether this ...
- ☐ I'm uncertain about ...

IN SENTENCES SUCH AS "IT IS IMPORTANT THAT THE MINISTRY CONSIDER THE CONSEQUENCES OF THIS REGULATION FOR ...," NOTICE THAT THE VERB THAT COMES AFTER "THAT" NEVER CHANGES ITS FORM.

- IT IS IMPORTANT THAT HE DO SOMETHING. (NO "S")
- IT IS IMPORTANT THAT HE NOT DO SOMETHING. (NEGATIVE FORM)

## LANGUAGE FOR THE BODY & CONCLUSION – IDENTIFYING ISSUES & MAKING RECOMMENDATIONS

### IDENTIFYING AN OVERLOOKED POINT

- ☐ Have you taken into account ...?
- ☐ Has it occurred to you that ...?
- ☐ Do you realize that ...?
- ☐ I was wondering if you'd thought of ...?
- ☐ Wouldn't you agree that ...?
- ☐ Wouldn't it be a good idea to ...?

### SUGGESTING ANOTHER WAY TO LOOK AT AN ISSUE

- ☐ There are, if I may say so, certain points you should bear in mind ...
- ☐ There are other considerations. For example, ...
- ☐ If we look at it in another light ...
- ☐ Seen from another angle, one could say ...
- ☐ I wonder if you've considered ...

### POINTING OUT THAT SOMEONE IS WRONG

- ☐ I wonder if that view is justified in light of ...
- ☐ I don't think you fully appreciate the fact that ...
- ☐ It would be in your own interest to ...

### EXPRESSING RESERVATIONS

- ☐ I have certain reservations about ...
- ☐ I have strong reservations about ...
- ☐ I have certain misgivings about ...
- ☐ It may be prudent to reconsider ...
- ☐ I must admit that I'm rather skeptical about ...
- ☐ Under no circumstances should we come to a hasty decision on this.
- ☐ I am afraid such a decision might lead to ...
- ☐ I feel that in view of ... it would be prudent/sensible to ...

### STRONG RECOMMENDATIONS

- ☐ I strongly recommend that ...
- ☐ I suggest most strongly that ...
- ☐ I advise you most strongly to ...
- ☐ In our view, it is high time that ...
- ☐ In my view, the only viable solution is ...

### STANDARD RECOMMENDATIONS

- ☐ I propose that ...
- ☐ I recommend that ...
- ☐ I suggest that ...
- ☐ My proposal is that ...
- ☐ My recommendation is that ...
- ☐ My suggestion is that ...

### SOFT RECOMMENDATIONS

- ☐ I would propose that ...
- ☐ I would recommend that ...
- ☐ I would suggest that ...
- ☐ I would like to put forward a proposal that ...
- ☐ I wonder if I might suggest ...

### USING THE WORD "RECOMMEND"

- ☐ SVO: I <sup>s</sup>recommend <sup>v</sup>policy <sup>o</sup>intervention in this matter.
- ☐ SVO: I <sup>s</sup>recommend <sup>v</sup>intervening <sup>o</sup>in this matter.
- ☐ SVSVO: I <sup>s</sup>recommend <sup>s</sup>(that) <sup>v</sup>we <sup>s</sup>intervene <sup>v</sup>in this matter.

**Note.** This third example uses a quite formal grammar structure that we saw above when discussing the use of the word *important* called the subjunctive mood. It can lend a formal air to your writing. The verb that appears after *recommend that* ("intervene" in the above sentence) never changes its form:

- I recommend that you intervene ...
- I recommend that he intervene... (no "s")
- I recommend that you not intervene

This structure can also be used with words such as request, suggest, and insist.

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- <sup>i</sup> Jerry Ellig. Mercatus Center, George Mason University. “A guide to writing public interest comments using economic analysis.” <https://www.mercatus.org/system/files/Ellig-How-PIC-web.pdf>
- <sup>ii</sup> These three forms of argument (ethos, logos, and pathos) were a large part of ancient Greek rhetoric and extensively studied by Aristotle.
- <sup>iii</sup> Public Comment.org - <https://publiccommentproject.org/how-to> and Jerry Ellig. Mercatus Center, George Mason University. “A guide to writing public interest comments using economic analysis.”
- <sup>iv</sup> Example from The Union of Concerned Scientists (UCS) accessed at <https://www.regulations.gov/document?D=EPA-HQ-OAR-2017-0091-3428>
- <sup>v</sup> Public Comment.org - <https://publiccommentproject.org/how-to> and Jerry Ellig. Mercatus Center, George Mason University. “A guide to writing public interest comments using economic analysis.”
- <sup>vi</sup> Elizabeth D. Mullin. “The art of commenting: How to influence environmental decisionmaking with effective comments.” 2nd edition
- <sup>vii</sup> Example from University of California, San Francisco Program on Reproductive Health and the Environment (PRHE) accessed at <https://prhe.ucsf.edu/sites/prhe.ucsf.edu/files/2016%2012%2009%20UCSF%20Comments%20to%20DPR.pdf>
- <sup>viii</sup> Jerry Ellig. Mercatus Center, George Mason University. “A guide to writing public interest comments using economic analysis.” <https://www.mercatus.org/system/files/Ellig-How-PIC-web.pdf>
- <sup>ix</sup> Public Comment.org - <https://publiccommentproject.org/how-to> and Jerry Ellig. Mercatus Center, George Mason University. “A guide to writing public interest comments using economic analysis.”
- <sup>x</sup> Example from John Kruse (WAEES) accessed at <https://www.regulations.gov/document?D=EPA-HQ-OAR-2017-0091-3253>
- <sup>xi</sup> Jerry Ellig. Mercatus Center, George Mason University. “A guide to writing public interest comments using economic analysis.” <https://www.mercatus.org/system/files/Ellig-How-PIC-web.pdf>
- <sup>xii</sup> Stuart Shapiro. “When will they listen? Public comment and highly salient regulations” (Working Paper No. 13-15, Mercatus Center at George Mason University, Arlington, VA, September 2013), 15, accessed at <http://mercatus.org/publication/when-will-they-listen-public-comment-and-highly-salient-regulations>
- <sup>xiii</sup> Public Comment.org - <https://publiccommentproject.org/how-to>
- <sup>xiv</sup> Example from John Krise (WAEES) accessed at <https://www.regulations.gov/document?D=EPA-HQ-OAR-2017-0091-3253>
- <sup>xv</sup> Example from University of California, San Francisco Program on Reproductive Health and the Environment (PRHE) accessed at <https://prhe.ucsf.edu/sites/prhe.ucsf.edu/files/2016%2012%2009%20UCSF%20Comments%20to%20DPR.pdf>
- <sup>xvi</sup> Public Comment.org - <https://publiccommentproject.org/how-to>
- <sup>xvii</sup> Jerry Ellig. Mercatus Center, George Mason University. “A guide to writing public interest comments using economic analysis.” <https://www.mercatus.org/system/files/Ellig-How-PIC-web.pdf>
- <sup>xviii</sup> Example form Marissa Baskett accessed at <https://www.regulations.gov/document?D=EPA-HQ-OAR-2017-0355-3092>
- <sup>xix</sup> Example from The Center for Human-Compatible Artificial Intelligence, the Future of Life Institute, the Center for Long-Term Cybersecurity, and The Future Society accessed at <https://www.regulations.gov/comment/OMB-2020-0003-0081>