



Buyers Up • Congress Watch • Critical Mass • Global Trade Watch • Health Research Group • Litigation Group
Joan Claybrook, President

May 28, 2002

John Morrall
Office of Information and Regulatory Affairs
Office of Management and Budget
NEOB, Room 10235
725 17th Street, N.W.
Washington, D.C. 20503

RE: Comments to Draft Report to Congress on the Costs and Benefits of Federal Regulations (67 FR 15014)

Dear Mr. Morrall:

This letter is in response to OMB's request for comments on the Draft Report to Congress on the Costs and Benefits of Regulations. Pursuant to our conversation today with your associate, Stewart Shapiro, we submit this letter as a "placeholder" and intend to submit substantive comments by the close of business tomorrow, May 29, 2002. Our understanding is that consideration of our comments will not be adversely impacted by this schedule for submission.

Our comments will address **three broad issues: the inherent flaws** in the regulatory accounting process and OIRA's underlying analytical methodologies, overreaching by OIRA, and the creation of a regulatory "hit list." We appreciate the opportunity to comment on OMB's Draft Report and hope that our comments will be carefully considered.

Sincerely,

Joan Claybrook
President, Public Citizen

Ralph Nader, Founder

215 Pennsylvania Ave SE • Washington, DC 20003 • (202) 546-4996 • www.citizen.org