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In this rulemaking, there are two issues at hand, the first one being the wording "thirty days" verses "monthly" and the other is the effective date of the changes.

I agree with the commission that the wording should be "thirty (30) days" as opposed to "monthly". This leaves no ambiguity as to how often the list should be acquired.

As for the second issue, I feel that the effective date should be somewhere between 3 to 6 months from the enactment of the new rules. I find no reason why it should take longer than 3 months for a person or company to update their systems to download the list every 30 days. In fact I believe that most people would be able to accomplish this task within a month. By making the effective date 3 months from the enactment of the rules, you would be placing no undue burden on businesses but you would be increasing the effectiveness of the law for new consumers that sign up.