



May 17, 2021

VIA ELECTRONIC MAIL

Katy Kale, Acting Administrator
U.S. General Services Administration

Nitin Shah, General Counsel
Office of the General Counsel
U.S. General Services Administration

Tobias Schroeder, Director
eRulemaking Program Management Office
Office of Regulation Management
Office of Government-wide Policy
U.S. General Services Administration
tobias.schroeder@gsa.gov;
eRulemaking@gsa.gov

Eddie Hartwig, Acting Administrator
U.S. Digital Service
Edward_j_hartwig@usds.gov;
usds@omb.eop.gov

Dear Acting Administrator Kale, Director Schroeder, General Counsel Shah, and Acting Administrator Hartwig:

Democracy Forward and eight other public interest organizations (“Signatory Organizations”)¹ are writing to call your attention to substantial barriers to public access to agency rulemaking dockets—to the detriment of agency transparency and accountability—created by Regulations.Gov, a website managed by the U.S. General Services Administration (“GSA”) through the eRulemaking program. The new version of the website, conceived and planned during the Trump administration, represents an extraordinary retrenchment in public access. GSA has an opportunity and obligation to correct this issue.

Regulations.Gov has long been the primary public access point for agency rulemaking “e-dockets” and their contents, such as proposed and final rules, supporting data, and public comments. Despite its historical limitations, the prior version of Regulations.Gov maintained e-docket information in a way that was rationally organized and reasonably accessible to interested parties. Unfortunately, the new version of Regulations.Gov erects substantial and unacceptable barriers to the work of organizations such as Democracy Forward and the Signatory Organizations that seek to access rulemaking dockets, engage with the regulatory process, educate the public, provide feedback on government proposals, and monitor or enforce agencies’ compliance with federal law. In doing so, the new Regulations.Gov implicates section 206 of the E-Government Act of 2002 and the Federal Information Policy Act.²

¹ This letter is joined by Public Citizen, the Georgetown Law Institute for Constitutional Advocacy and Protection, the National Health Law Program, the National Center for Youth Law, Planned Parenthood Federation of America, the Center for Science in the Public Interest, Union of Concerned Scientists, and the Natural Resources Defense Council.

² 44 U.S.C. § 3506(b)(1)(C).

Part I of this letter explains the role of Regulations.Gov in agencies’ compliance with their legal obligations and in the work of public interest organizations like Democracy Forward and the Signatory Organizations. **Part II** explains the unacceptable deficiencies in the public-facing user experience that were introduced by the new website and the arbitrary GSA policies that have made it infeasible for members of the public to build a workaround solution. This explanation is supplemented by Appendices A (a detailed Regulations.Gov User Experience Journey) and B (Technical Problems with Regulations.Gov API). **Part III** calls attention to various ways in which the failures of the new Regulations.Gov undermines GSA’s and other federal agencies’ compliance with law. Finally, in **Part IV**, we request that GSA take all necessary steps to restore reasonable access to rulemaking e-dockets and their contents. We propose specific and straightforward steps that would immediately provide incremental improvements to Regulations.Gov. And we further urge GSA to conduct thorough public user research and redesign both the website and the “application programming interface” (“API”) to be more usable as specified in the U.S. Chief Information Officer’s Digital Service Playbook.

GSA should act with urgency. Each day that passes with regulatory docket information locked behind the broken Regulations.Gov website is one in which the ability of the public to review, assess, engage with, and, if necessary, object to the work of the federal government is critically hampered.

I. Regulations.Gov Was Originally Created to Increase Public Access to Agency Rulemaking Dockets and to Enhance Agency Transparency and Accountability.

Regulations.Gov was established in 2003 to implement the requirements of section 206 of the E-Government Act of 2002.³ Section 206 was intended to “improve performance in the development and issuance of agency regulations by using information technology to increase access, accountability, and transparency” and “enhance public participation in Government by electronic means, consistent with requirements” of the APA.⁴ To the extent practicable, it requires agencies to:

- make dockets for rulemakings under 5 U.S.C. § 553 of the APA available on a publicly accessible website or “e-docket;”
- make available on the e-docket “all submissions” under 5 U.S.C. § 553(c) of the APA, which requires agencies to allow members of the public to submit comments and written data on proposed rulemakings;
- make available on the e-docket all other material “that by agency rule or practice” are part of the rulemaking docket under 5 U.S.C. § 553(c) of the APA; and
- electronically accept comment submissions under 5 U.S.C. § 553(c) of the APA.⁵

³ See Pub. L. No. 107-347, § 206, 116 Stat. 2899, 2915 (2002).

⁴ *Id.* § 206(a).

⁵ *Id.* § 206 (c)-(d).

A. *Regulations.Gov Is the Primary—and Often Only—Public Docket for Federal Agency Rulemaking.*

Regulations.Gov is the primary vehicle through which most federal agencies comply with the e-docket requirements of the E-Government Act.⁶ Agencies create e-dockets and upload material through the Federal Docket Management System (“FDMS”); FDMS then manages a data feed that updates e-dockets on Regulations.Gov on a daily basis.⁷

Regulations.Gov is operated by the eRulemaking Program, a cross-agency initiative established in 2002 pursuant to the E-Government Act.⁸ From 2003 until 2019, the eRulemaking Project Management Office (“PMO”) was housed in the Environmental Protection Agency (“EPA”).⁹ In October 2019, the Trump Administration transferred ownership of the eRulemaking PMO to the newly established GSA Office of Regulation Management.¹⁰

Consistent with the intent of the E-Government Act, the purpose of Regulations.Gov is to “remove[] the logistical barriers that made it difficult for a citizen to participate in the complex regulatory process” and to ensure that “the public can participate and impact Federal rules and regulations.”¹¹ Over time, the website has become the primary—and sometimes *only*—resource for public access of agency rulemaking dockets under 5 U.S.C. § 553 of the APA. For example, EPA’s Docket Center website directs users to its e-dockets on Regulations.Gov.¹² While EPA has a physical Docket Center Reading Room available to those who have the means to travel to Washington, D.C. during the work week, even that option has been unavailable during the COVID-19 pandemic.¹³ In order to continue to promote the goals of the E-Government Act and modern realities, the Administrative Conference of the United States has recommended that Regulations.Gov be managed in a manner to achieve “maximum public disclosure.”¹⁴

⁶ Admin. Conf. of the U.S., Recommendation 2018-6, Improving Access to Regulation.gov’s Rulemaking Dockets, 84 Fed. Reg. 2139, 2143 (Dec. 13, 2018). Some independent agencies such as the Securities and Exchange Commission do not participate. *Id.* In all, 221 federal agencies rely on Regulations.Gov. *Review of E-Rulemaking Comment Systems: Joint Hearing Before the Permanent Subcomm. on Investigations and the Subcomm. on Reg. Affairs & Mgmt. of the S. Comm. on Homeland Sec. & Governmental Affairs*, 116th Cong. 1 (2019) (statement of Elizabeth Angerman, Principal Deputy Associate Administrator, Office of Government-Wide Policy, GSA) (“GSA Comments to Senate Committee”).

⁷ *Id.*; 84 Fed. Reg. at 2143.

⁸ 84 Fed. Reg. at 2143.

⁹*Id.*

¹⁰ *About the eRulemaking Initiative*, Regulations.Gov, <https://www.regulations.gov/about> (last visited May 6, 2021). The PMO works closely with an Executive Steering Committee comprised of representatives of 43 agencies and an Advisory Board comprised of representatives of partner agencies. *Id.*

¹¹ *Id.*

¹² *EPA Docket Center*, <https://www.epa.gov/dockets> (last visited May 6, 2021).

¹³ *EPA Docket Center Reading Room*, <https://www.epa.gov/dockets/epa-docket-center-reading-room> (last visited May 6, 2021).

¹⁴ 78 Fed. Reg. 41,352, 41,360 (July 10, 2013).

B. The Original Regulations.Gov Facilitated the Public’s Ability to Participate in Rulemaking and Hold Government Agencies Accountable.

The original version of Regulations.Gov greatly increased the ability of the public to participate in the rulemaking process and hold agencies accountable. Members of the public like Democracy Forward and the Signatory Organizations have used it to review proposed rulemakings, consider comments already submitted by others, and submit comments to assist agencies in their rulemaking process. Once rules have been finalized, organizations used the website to review final rules, supporting material, and public comments to determine whether the agency complied with the law and, if not, to explain any deficiencies to the agency or to a court.

Organizations like Democracy Forward and the Signatory Organizations that seek to assess the validity of agency actions and to educate the public on agency actions often have a particular need to locate and review public comments. Public comments can inform, for example, what an agency knew and should have addressed during the rulemaking process or what potential challenges to a rulemaking have been preserved for judicial review.¹⁵ But complex rulemakings may have tens or even hundreds of thousands of comments submitted by advocacy groups, regulated entities, and private individuals.¹⁶ And not all comments are created equal. Comments submitted by an organization or regulated entity with subject-matter expertise, for example, are likely to be of particular interest to the work of Democracy Forward and the Signatory Organizations. Comments submitted in the form of a letter or brief, rather than as a text entry to a web form, are likely to have more detail and better support, particularly if they include scientific and other data. The ability to efficiently review and quickly identify the comments most likely to contain relevant feedback to the agency is crucial to our ability to undertake our work.

For example, Democracy Forward brought numerous lawsuits challenging final rules issued by federal agencies between 2017 and 2020, such as the recently filed challenge to the Department of Health and Human Services (“HHS’s”) “Sunset Rule.”¹⁷ Access to e-docket information facilitated this work. By reviewing 530 public comments, Democracy Forward was able to uncover that the Sunset Rule was nearly universally opposed and that many commenters objected to the unreasonably short public comment period.¹⁸ HHS itself has acknowledged the public value of this effort; the errors identified in Democracy Forward’s litigation convinced

¹⁵ *E.g.*, *Perez v. Mortg. Bankers Ass’n*, 575 U.S. 92, 96 (2015) (“An agency must consider and respond to significant comments received during the period for public comment.”); 42 U.S.C. § 7607(d)(7)(B) (Under the Clean Air Act, “[o]nly an objection to a rule or procedure which was raised with reasonable specificity during the period for public comment . . . may be raised during judicial review.”).

¹⁶ For example, a proposed rule under Section 1557 of the Patient Protection and Affordable Care Act induced the public to submit 155,966 comments. <https://www.regulations.gov/document/HHS-OCR-2019-0007-0001>.

¹⁷ *County of Santa Clara v. U.S. Department of Health & Human Services*, No. 21-cv-1655 (N.D. Cal. filed Mar. 9, 2021). The Sunset Rule amended approximately 18,000 regulations issued by HHS to add automatic expiration dates. *See* 86 Fed. Reg. 5,694 (Jan. 19, 2021).

¹⁸ Complaint, *County of Santa Clara*, Dkt. 1 ¶¶ 48-50, 60 (filed Mar. 9, 2021).

HHS to issue a regulatory freeze of the rule during the pendency of the litigation.¹⁹ Similarly, relying on review of the relevant e-docket, the National Center for Youth Law challenged a Department of Education rule held to have illegally delayed important protections for children with disabilities.²⁰

Although imperfect, the original Regulations.Gov reasonably accommodated the need to access e-dockets and their contents. It was rationally organized and permitted the public to search for and find e-dockets and their contents. It had a “docket summary” landing page, which included summaries of, and links to, the major docket contents, such as proposed and final rules, supporting material, and comments. While it was not always possible to easily review comments *directly* from the website, users could download an index of comments in comma separated value “CSV” spreadsheet format.²¹ As shown in Attachment A, a sample excerpt from a CSV file downloaded from the prior version of Regulations.Gov, these indices contained useful information on the person and organization that submitted the comment and whether it has attachments.²² This allowed users to skim the comments for relevance. The original Regulations.Gov also permitted users to “bulk download” comments. Armed with the index and a full comment set, users could locate and access the relevant material offline.

II. Trump Administration Changes to Regulations.Gov Impair the Public’s Ability to Reasonably Access Rulemaking e-Dockets.

Regulations.Gov was originally built on an Adobe application framework called Flash, which, like all technologies, eventually became outdated. In July 2017, six months into the Trump administration, Adobe announced that Flash would be phased out by the end of 2020.²³ From July 2017 until October 2019, the Trump administration did little, if anything, to prepare for the technological change.

On October 1, 2019, the Trump administration transferred the eRulemaking Program to GSA under a new Office of Regulation Management, “put[ting] GSA under a challenging timeline to replace the software only 14 months after assuming ownership of the eRulemaking systems.”²⁴ In a statement later that month to the Senate Homeland Security and Governmental Affairs Committee, a GSA official said that it nonetheless intended to “improve the customer experience” for existing services on Regulations.Gov and to “apply innovative technology

¹⁹ 86 Fed. Reg. 15,404, 15,405 (Mar. 23, 2021) (staying the Sunset Rule under 5 U.S.C. § 705 because “the Court could find merit in some of Plaintiffs’ claims”).

²⁰ *Council of Parent Attorneys and Advocates, Inc. v. DeVos*, 365 F.Supp.3d 28 (D.D.C. 2019).

²¹ See Attachment A (Spreadsheet display of CSV file downloaded from the prior version of Regulations.Gov for the rulemaking docket PHMSA-2011-0023). This spreadsheet shows data fields for “Document Title,” “Document Type,” “Attachment Count,” “Submitter Last Name,” “Submitter First Name,” “Organization,” “Document ID,” “Document Sub Type,” “File Type,” “Number of Pages,” and “Document Detail” (which contains a link to the detail webpage). Additional fields have been hidden from view on the attachment.

²² *Id.*

²³ Frederic Lardinois, *Get ready to finally say goodbye to Flash—in 2020*, Tech Crunch (July 25, 2017), <https://techcrunch.com/2017/07/25/get-ready-to-say-goodbye-to-flash-in-2020/>.

²⁴ Attachment B (meeting minutes from Dec. 1, 2020 meeting of the eRulemaking Advisory Board and the Change Control Board).

solutions to promote public access, accountability, and transparency.”²⁵ Unfortunately, many of the changes instead worsened the public-facing user experience, harming transparency and accountability in the process.

A. Without Conducting Appropriate Public-Facing User Research—and Without Adequate Funding—GSA Implemented a Deficient Version of Regulations.Gov.

As far as we can tell, GSA made little attempt to follow key portions of the U.S. Chief Information Officer’s Digital Services Playbook, a set of guidelines for how government agencies should design and build digital media (like websites) through which the public interacts with government.²⁶ Because Regulations.Gov is supposed to facilitate public involvement, GSA should have focused in particular on “Plays” 1, 2, and 3: “understand what people need,” address the whole user experience, and make the digital platform “simple and intuitive.”²⁷ GSA instead appears to have skipped the steps affecting the public-facing user experience.

GSA’s primary attempt at public engagement—a notice in the Federal Register inviting members of the public and subject matter experts to attend one of two town hall meetings or to submit public comment—was poorly publicized and not focused on understanding how the public uses Regulations.Gov.²⁸ Crucially, the notice requested input about “modernization” of the website and ways to improve its functionality, but nowhere alerted the public that GSA was contemplating a drastic *decrease* in public access to regulatory information. The notice was published during the holidays, on December 31, 2019, and required “proposals” to be presented at the first meeting to be submitted to GSA only ten days later, by January 10, 2020. The transcript of the first town hall meeting shows that it was focused primarily on agency concerns about mass and fake comment submissions.²⁹ Slides from the second town hall meeting similarly focus on the management of mass and fake comments as well as agency use of comments.³⁰ The only discussion of the public-facing user experience of Regulations.Gov came in the form of comments from the President of the American Association of Law Libraries, who recommended an *increase* in functionality affecting public users on Regulations.Gov.³¹ And, despite the widespread impact of changes to Regulations.Gov, it appears that GSA’s poor efforts at public engagement resulted in only a single, off-point public comment.³²

²⁵ GSA Comments to Senate Committee.

²⁶ U.S. Digital Service, Digital Services Playbook, <https://playbook.cio.gov/> (last visited May 6, 2021).

²⁷ *Id.*

²⁸ *See* 84 Fed. Reg. 72,364 (Dec. 31, 2019).

²⁹ Tr. GSA, *Mass & Fake Comments: Public Meeting* (Jan. 30, 2020), available at https://downloads.regulations.gov/GSA-GSA-2019-0002-0028/attachment_1.pdf.

³⁰ GSA, Public Meeting Consolidated Slides (Apr. 30, 2020), <https://www.regulations.gov/document/GSA-GSA-2020-0002-0014>.

³¹ *Id.* Slides 49-53.

³² *See* Comment on GSA Notice: Meetings: Modernizing Services for Regulation Management (posted Jan. 29, 2020), <https://www.regulations.gov/document/GSA-GSA-2019-0002-0025>. As explained further in Appendix A, as

GSA's other attempt at public engagement was to intermittently redirect users of Regulations.Gov to a "Beta" version of the new website instead of the old version. The Beta version was available online at least as of May 21, 2020, less than a month following GSA's second town hall meeting, and included a link for public feedback. As far as we can tell, there is no public record of the feedback GSA received from users testing its Beta website. However, anecdotally, staff members at Democracy Forward and the National Center for Youth Law (a Signatory Organization) contacted GSA at various times to report frustrations with the distressing diminishment in public access to rulemaking dockets (detailed further below), and GSA staff reported that they had received similar feedback from others. Also anecdotally, public Twitter and blog posts expressed frustration with, among other things, the Beta site's poor search functionality and lack of usable information on comment lists, and encouraged others to submit feedback.³³

By December 17, 2020, GSA was able to release only a pared-down replacement version of Regulations.Gov (then still labelled "Beta") that had "only certain core functions required by agencies."³⁴ Basic features previously available on the old version of Regulations.Gov—including those used by agencies such as deduplication and bulk upload, as well as those used primarily by members of the public such as comment indices and bulk comment download—were not included.

Worse, the Trump White House deliberately underfunded the program for 2021. According to minutes from a December 2020 meeting of the eRulemaking Advisory Board, the PMO estimated that it needed \$1.6 million simply to add features requested by agencies.³⁵ However, the Trump administration requested only \$1 million and received less.³⁶ Even basic features required by the agency-side FDMS system, such as deduplication and bulk upload, were planned for 2021 only in "manual workaround" format.³⁷ GSA reported that it would "not be able to restore the full service" or implement many "key features" in fiscal year 2021.³⁸ Of the features that were planned, nearly all were focused on the agency-side FDMS system or other

with other information supposedly available on Regulations.Gov, the e-docket for this notice and its contents are extremely difficult to find. If other comments exist, they are not reasonably accessible on Regulations.Gov.

³³ Kurt R. Karst, *Tuesdays (and Thursdays) with Regulations.gov BETA*, FDA Law Blog (June 11, 2020), <https://www.fdalawblog.net/2020/06/tuesdays-and-thursdays-with-regulations-gov-beta/> ("Unfortunately, the new, but not improved, Beta site is not so easy to maneuver."); Rachel Fabi (@faBioethics), Twitter (Sept. 29, 2020), <https://twitter.com/faBioethics/status/1310986019035021313?s=20> ("Is the 'beta' version of regulations.gov just . . . a non-functional version of the old website?"); Joe Valenti (@moneyjoev), Twitter (Aug. 20, 2020), <https://twitter.com/moneyjoev/status/1296537679757180929?s=20> ("Is it just me or is the new beta site for regulations.gov simply awful and unhelpful?"); Natalie Fertig (@natsfert), Twitter (May 21, 2020), <https://twitter.com/natsfert/status/1263572540133433347> ("I want to know if I can submit a comment to protest the new regulatory comments page layout. Each entry used to say who submitted the comment/what org they were from BEFORE you opened it!").

³⁴ Attachment B.

³⁵ *Id.* This amount apparently did not include the cost to add important public-facing features.

³⁶ *Id.*

³⁷ *Id.*

³⁸ *Id.*

agency requests.³⁹ There was no 2021 plan to restore the most basic public-facing features, such as bulk download or comment search and sort.⁴⁰

As of February 18, 2021, the Beta version was finalized as the new Regulations.Gov, entirely replacing the old version, while addressing none of the Beta version's significant shortcomings.⁴¹ The eRulemaking program claims that the new version “makes it easier for the public to participate in the regulatory process” and “enhance[s] search capabilities.”⁴² This has been far from the experience of Democracy Forward and the Signatory Organizations.

B. The New Regulations.Gov is Poorly Organized and Eliminates Key Features that Previously Allowed Members of the Public to Hold Agencies Accountable.

The new Regulations.Gov is so poorly designed that it impairs the ability of public organizations like Democracy Forward and the Signatory Organizations to find and understand e-dockets and their contents, to sort and manage comments, and even to download e-docket data in a way that would allow users to sort and manage comments for themselves. These deficiencies are illustrated in detail in a User Experience Journey in Appendix A, a step-by-step narrative of the frustrating process of attempting to locate and use e-docket information. To summarize:

- The website's ineffective search functionality makes it extremely difficult to find e-dockets. Users are unable to locate docket numbers using the docket number character format listed in the Federal Register (because search does not account for non-standard characters) or with partial docket numbers (which are sometimes listed in the Federal Register). Docket number search takes users not to docket pages, but to “documents,” many of which having nothing to do with the docket or agency searched.
- The elimination of docket summary pages and the poor data organization exacerbate the difficulty of locating relevant docket numbers. For example, the docket for a Federal Register Notice called “Modernizing Services for Regulation Management” is vaguely labelled in Regulations.Gov as “GSA- Notices -2019,” making it impossible for a user to search by title for this and similar docket numbers.
- Comments are unreasonably difficult to locate. The comment indicator on the docket page does not link to comments. Comments are instead hidden behind “documents” with no signals to the user for where to find them; user must click around on all the documents to find them, and even then, some comments are impossible to locate.

³⁹ Attachment C at 4-18 (eRulemaking Update, Office of Regulation Management, December 15, 2020).

⁴⁰ *Id.* at 4.

⁴¹ *Frequently Asked Questions: Site FAQs*, Regulations.Gov, <https://www.regulations.gov/faq?type=site> (last visited May 6, 2021).

⁴² *Managing the Federal Rulemaking Process*, GSA, <https://www.gsa.gov/policy-regulations/regulations/managing-the-federal-rulemaking-process> (last visited May 6, 2021).

- Comment lists, once located, provide no information that would assist the user to determine which comments to review further. For example, the lists do not display author, organization, comment text, or whether the comment has an attachment, even though Regulations.Gov maintains data fields for this information on each comment. There is no option to sort or filter comments.
- There is no ability to view comment attachments in the webpage without downloading the comment, requiring 3-4 extra clicks simply for the user to determine if a comment is relevant.
- Agencies use the comment data fields (like “author” and “title”) inconsistently and may not use them at all. Comment titles may be identical for each comment, making it difficult for users to divide comment review or keep track of which comments have already been reviewed.
- The new website eliminates the option from the original Regulations.Gov to download a comment index in a CSV spreadsheet file, making it impossible for users to skim comments offline to determine which ones are relevant.
- The new website eliminates the option to bulk download comments.
- The new website eliminates the ability to sign up for docket alert emails.

C. Artificial Restrictions of the eRulemaking Program and Poor Data Organization on Regulations.Gov Make It Impossible for Third Party Web Applications to Effectively Incorporate and Organize E-Docket Information.

The frustrating experience of using the new Regulations.Gov website may lead some members of the public to attempt to build their own technological workaround to create for themselves a more functional process. The eRulemaking program expressly encourages the public to do this. Regulations.Gov permits members of the public to request an “application programming interface” or “API” (a tool used by web developers to allow one web application to talk to another) key through the Data.Gov portal to “allow for users to find creative ways to present regulatory data.”⁴³ An API “key” is code that authorizes a system or person to retrieve data from one website (like e-docket data from Regulations.Gov) and use it in another (like a third-party web application) where the data can be reorganized in a more user-friendly manner. In theory, members of the public should be able to use the Regulations.Gov API to create their own third-party web applications that retrieve e-docket data from Regulations.Gov and better organize the content.

While the public may be able to create a solution to *present* data from Regulations.Gov in a more user-friendly way, artificial restrictions imposed by the GSA, combined with poor organization of e-docket data, make *use* of any third-party application technologically infeasible. These barriers are detailed in Appendix B. To summarize:

- The API keys issued by Data.Gov for the eRulemaking Program artificially restrict the number of API requests allowed in a given time period that external

⁴³ *Regulations.Gov API*, OpenGSA, <https://open.gsa.gov/api/regulationsgov/> (last visited May 6, 2021); *API Key Signup*, Data.gov, <https://api.data.gov/> (last visited May 6, 2021).

websites can make for Regulations.Gov data. The restriction is so low that (given the organization of data on Regulations.Gov), an external web application attempting to provide an index of comments to a typical docket (such as HHS-OS-2020-0012, which has 530 comments) would only be able to support a single user's access to a single docket in a given hour. For a larger docket (such as HHS-OCR-2019-0007-0001, which has 155,966 comments), the rate limit would cause the external website to take 156 hours—or 6 1/2 days—to simply provide users with an index of an e-docket's contents.

- Under a policy established during the Trump administration, GSA denies all web developer requests for a permanent increase to the rate limit. GSA will approve only a limited rate limit increase and only for a two-week period.
- The rate limit problem is exacerbated by the improper sorting and filtering options in the API and the insufficient data that api.Regulations.Gov provides in response to an API “call” for a comment list. When a third-party machine requests a list of comments for a document, the information returned does not include basic data fields such as author, organization, comment text, or whether the comment has an attachment. This means that the third-party application would have to make a separate “call” to Regulations.Gov for more information on each individual comment simply to generate a usable comment index.
- The ability of a third-party web application to use information from the comment data fields is further impeded by the agencies' poor and inconsistent use of critical comment detail data fields. Comments may have blank data fields (such as “Submitter Name” and “Organization Name”) and may have identical comment titles or titles that cannot be sorted by a machine. These issues mean that any comment index generated by an external website may not contain meaningful information at all.

III. Regulations.Gov In Its Current Form Frustrates GSA's Obligations Under the E-Government Act and the Federal Information Policy Act.

These new and artificial technological barriers are at cross-purposes with the E-Government Act. They decrease rather than “increase [the] access, accountability, and transparency” purposes of the E-Government Act. *See* Pub. L. No. 107-347, § 206. They diminish rather than “enhance public participation in Government by electronic means.” *See id.* Instead of making rulemaking dockets and “all submissions” under 5 U.S.C. § 553(c) of the APA available on a publicly accessible website, the new Regulations.Gov has made rulemaking dockets nearly inaccessible for practical purposes. *See id.*

The new Regulations.Gov also falls short of satisfying GSA's obligations under the Federal Information Policy Act, which generally governs the thoroughness and consistency of information dissemination by the federal government. By law, each agency, including GSA, is responsible for “improv[ing] the integrity, quality, and utility of information to all users within and outside the agency, including capabilities for ensuring dissemination of public information

[and] public access to government information.”⁴⁴ Congress, courts, and the public rely on “the transparent nature of administrative record building” to “facilitate[] accountability” of the agencies.⁴⁵ Administrative records allow Congress to “evaluate the agency’s implementation of legislative goals and formulate legislative responses,” allow “courts to assess agency decisionmaking,” and “provide both private groups and other government institutions with meaningful yardsticks for reviewing, assessing, and critiquing ultimate agency action.”⁴⁶

In short, by replacing Regulations.Gov with a new version that restricts the flow of information that agencies are required by law to disclose and that is necessary for meaningful judicial review, the Trump administration created barriers for advocacy organizations and watchdogs such as Democracy Forward and the Signatory Organizations, calling into question GSA’s compliance with federal law.

IV. GSA Should Immediately Correct the Technological Barriers to Access Created by the New Regulations.Gov.

To ameliorate these concerns, GSA should take immediate steps to ensure that members of the public can reasonably access and use e-dockets and their contents on Regulations.Gov. The necessary steps include, at least:

- Conducting user-experience research with non-government end users, as outlined in Plays 1 and 2 of the U.S. Chief Information Officer’s Digital Services Playbook, of both the Regulations.Gov website and the API served at api.Regulations.Gov.⁴⁷
- Establishing standards for data field usage, training agencies to use them consistently, and enforcing data standards upon data ingestion from agencies.
- Prioritizing website features that will improve the public’s ability to reasonably access and use Regulations.Gov, including:
 - Adding docket summaries with high-level list of docket contents (including proposed rules, final rules, comments, and supporting material) with links to each subcategory of content;
 - Adding bulk comment download;
 - Adding option to download comment index spreadsheets in comma separated value (“CSV”) format;
 - Improving search function to account for non-standard characters (which will allow recognition of docket number regardless of whether it is entered using hyphens or en-dashes);
 - Adding a data field to comments for “oppose,” “support,” or “informational only”;

⁴⁴ 44 U.S.C. § 3506(b)(1)(C).

⁴⁵ Kenneth A. Bamberger, *Regulation as Delegation: Private Firms, Decisionmaking, and Accountability in the Administrative State*, 56 Duke L.J. 377, 406 (2006).

⁴⁶ *Id.* at 407.

⁴⁷ <https://playbook.cio.gov/>.

- Adding ability to filter comments by, at least, whether or not the comment has an attachment; and
- Allowing users to sign up for docket notifications.
- Prioritizing API features that will enable third-party applications to effectively use the data, including:
 - Allowing users to request *permanent* increases in their API key rate limits to, at minimum, 10,000 requests per hour;
 - Enabling more granular API field-level filtering capability on comments within a document (e.g., organization = some value, or has Attachment = true); and
 - Enabling retrieval of comment data when using paged comment list for a document, including at minimum author name, organization, the existence of attachments, and an excerpt of the comment text.

Many of these steps could be implemented quickly and would provide immediate, albeit incremental relief. In addition to these functional changes, we highly recommend that the eRulemaking program open source the codebase under a permissive license (e.g., MIT, GPLv3, or BSD) for both Regulations.Gov and api.Regulations.Gov. Open sourcing the codebase will allow members of the public to discover the source code, make incremental improvements to the features and functionality of the website and API, and to submit those improvements to the eRulemaking program for approval and implementation.⁴⁸ Doing so would be consistent with Section 5 of the Federal Source Code Policy, as established by M-16-21.⁴⁹ To facilitate public assistance, the eRulemaking program should publish instructions on how to run the code locally and guidelines for public code contributions, including what is required to submit a pull request to merge code contributions into the government’s codebase. Finally, the codebase should be included in the source code register maintained by Code.Gov, a program also managed by GSA.

Twelve years ago, on President Biden’s second day as then-Vice President, President Obama signed a Memorandum emphasizing that “information maintained by the Federal Government is a national asset” and committing to take action to “disclose information rapidly in forms that the public can readily find and use” while “offer[ing] Americans increased opportunities to participate in policymaking and to provide their Government with the benefits of

⁴⁸ The Department of Defense maintains extensive information on how and why to open source government web applications. *Why Open Source*, Code.mil, <https://code.mil/why-open-source.html> (last updated Nov. 2, 2019).

⁴⁹ Office of Mgmt & Budget, Memorandum for the Heads of Departments and Agencies, Federal Source Code Policy: Achieving Efficiency, Transparency, and Innovation through Reusable and Open Source Software, M-16-21 (Aug. 8, 2016), *available at* https://www.whitehouse.gov/sites/whitehouse.gov/files/omb/memoranda/2016/m_16_21.pdf; *see also* Tony Scott, *The People’s Code*, CIO.Gov (Aug. 11, 2016), <https://www.cio.gov/2016/08/11/peoples-code.html>. According to Code.Gov, GSA has already updated its policies and acquisition language to be consistent with the Federal Source Code Policy. *Guidance: Agency Compliance*, Code.Gov, <https://code.gov/agency-compliance/compliance/dashboard> (last visited May 6, 2021).

their collective expertise and information.”⁵⁰ These commitments are fundamentally imperiled by locking vast troves of regulatory information behind the broken interface of the new Regulations.Gov.

We ask that you act expeditiously to begin to restore reasonable public access to federal rulemaking dockets. If you would like to discuss this request further, please contact Samara Spence and Aman George, at 202-701-1785, sspence@democracyforward.org, ageorge@democracyforward.org. We request that your office provide a written response to this letter within thirty days.

Sincerely,

Democracy Forward Foundation
Public Citizen
Georgetown Law Institute for Constitutional
Advocacy and Protection
National Health Law Program
National Center for Youth Law
Planned Parenthood Federation of America
Center for Science in the Public Interest
Union of Concerned Scientists
Natural Resources Defense Council

CC: Dominic Mancini, Deputy Administrator, Office of Information and Regulatory Affairs,
Office of Management and Budget

Sharon Block, Associate Administrator, Office of Information and Regulatory Affairs, Office of
Management and Budget

Krystal Brumfield, Associate Administrator, Office of Government-wide Policy, U.S. General
Services Administration

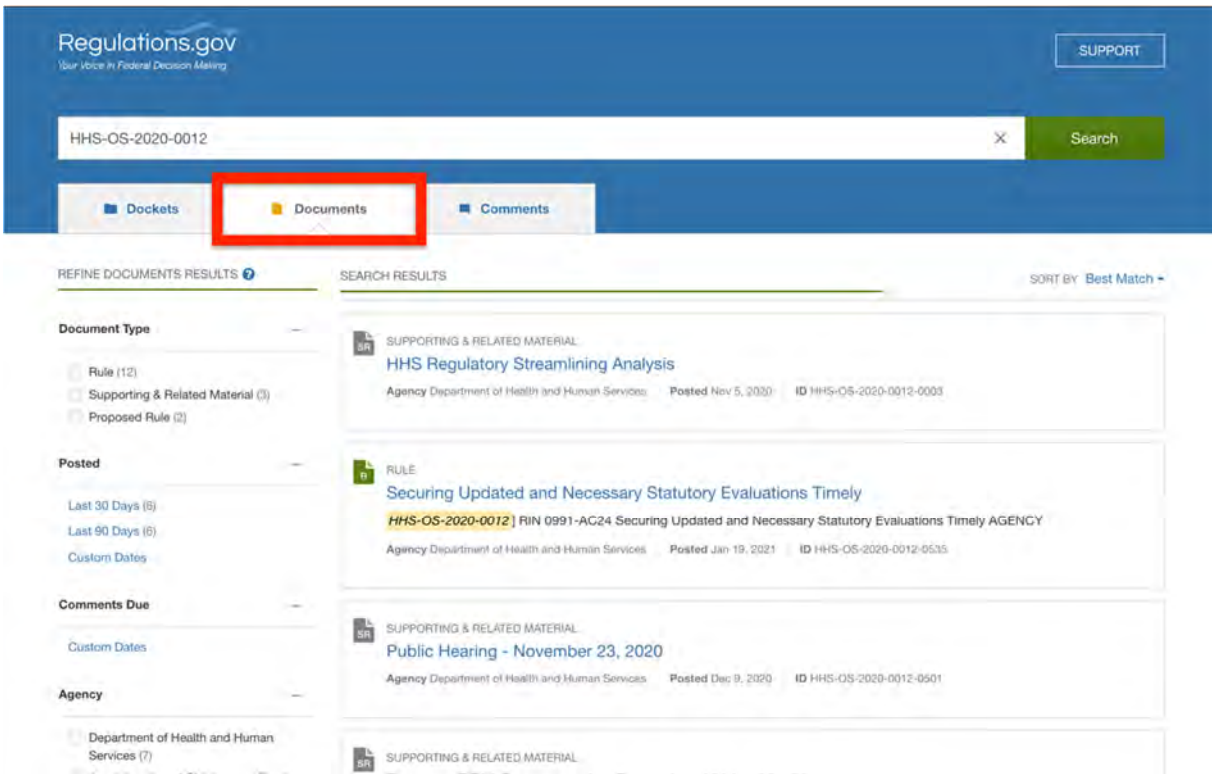
Patricia D. Sheehan Assistant Inspector General for Inspections, GSA Office of the Inspector
General

Jeremy Graboyes, Administrative Conference of the United States

⁵⁰ Memorandum on Transparency and Open Government, 74 Fed. Reg. 4685 (Jan. 21, 2009).

A user might then click to the “docket” tab, but that tab shows only a “[n]o results” note.⁵ A user might then return to the “documents” tab and filter by the Food and Drug Administration and the Centers for Medicaid & Medicare because these are sub-agencies of HHS. But this results in a list of documents unrelated to the Sunset Rule.⁶

A creative user might try re-typing the docket number as “HHS-OS-2020-0012,” with short hyphens instead of the en-dashes copied over from the docket number listed in the Federal Register. This, at last, results in a list of documents that appear relevant—but, still, not the docket itself.⁷



To get to the docket, one must click on the “docket” tab and then on the docket for a Rulemaking called “Securing Updated and Necessary Statutory Evaluations Timely.”⁸ But, unlike the old version of Regulations.Gov, the docket page contains no docket summary,⁹ so it would take a reasonable user that has a docket number nine clicks and some guess work simply to find the docket that tells the user nothing about the subject matter of the docket or the number or types of documents contained in the docket.

⁵ <https://www.regulations.gov/search/docket?filter=HHS%E2%80%93OS%E2%80%932020%E2%80%930012>.

⁶ [regulations.gov/search?agencyIds=FDA%2CCMS&filter=HHS-OS-2020-0012](https://www.regulations.gov/search?agencyIds=FDA%2CCMS&filter=HHS-OS-2020-0012).

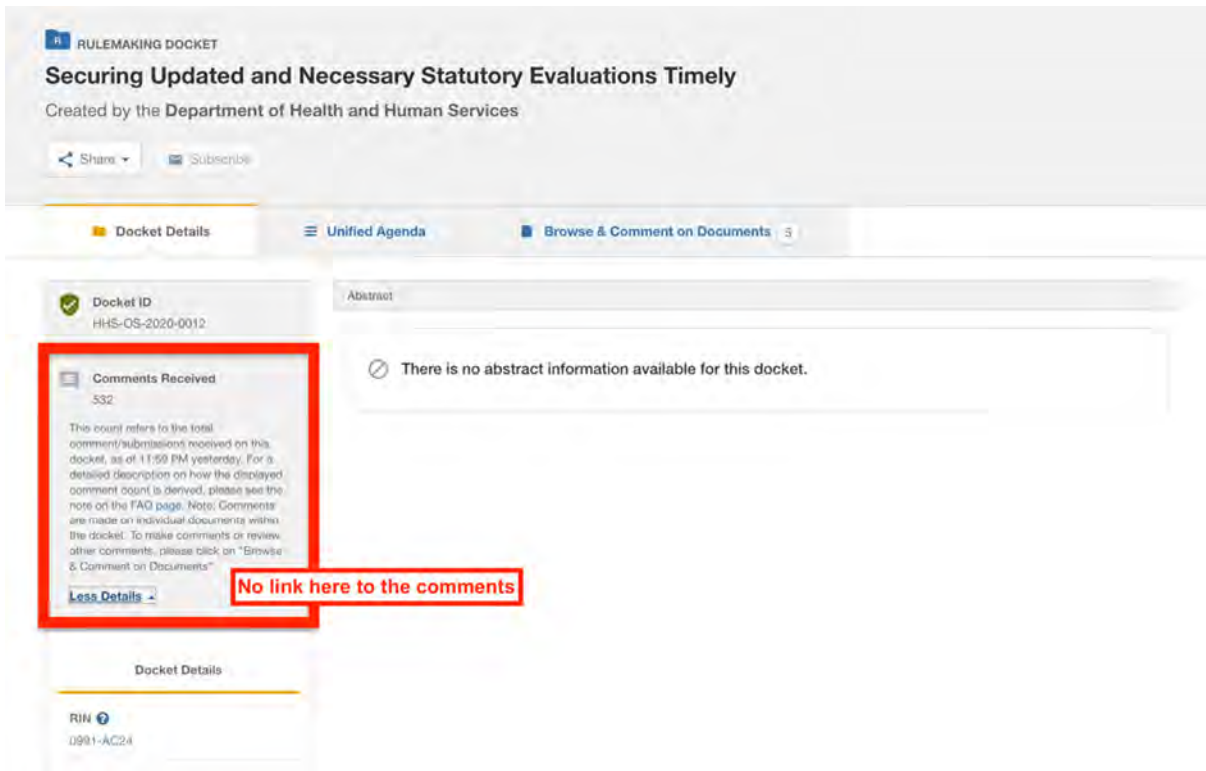
⁷ <https://www.regulations.gov/search?filter=HHS-OS-2020-0012>.

⁸ <https://www.regulations.gov/search/docket?filter=HHS-OS-2020-0012>.

⁹ <https://www.regulations.gov/docket/HHS-OS-2020-0012>.

Locating comments to the Sunset Rule is unnecessarily difficult because comments have been hidden behind specific documents with no signals to the user.

A small box on the left side of the docket page for the Sunset Rule says “Comments Received 532,” but the box provides no link to comments.¹⁰



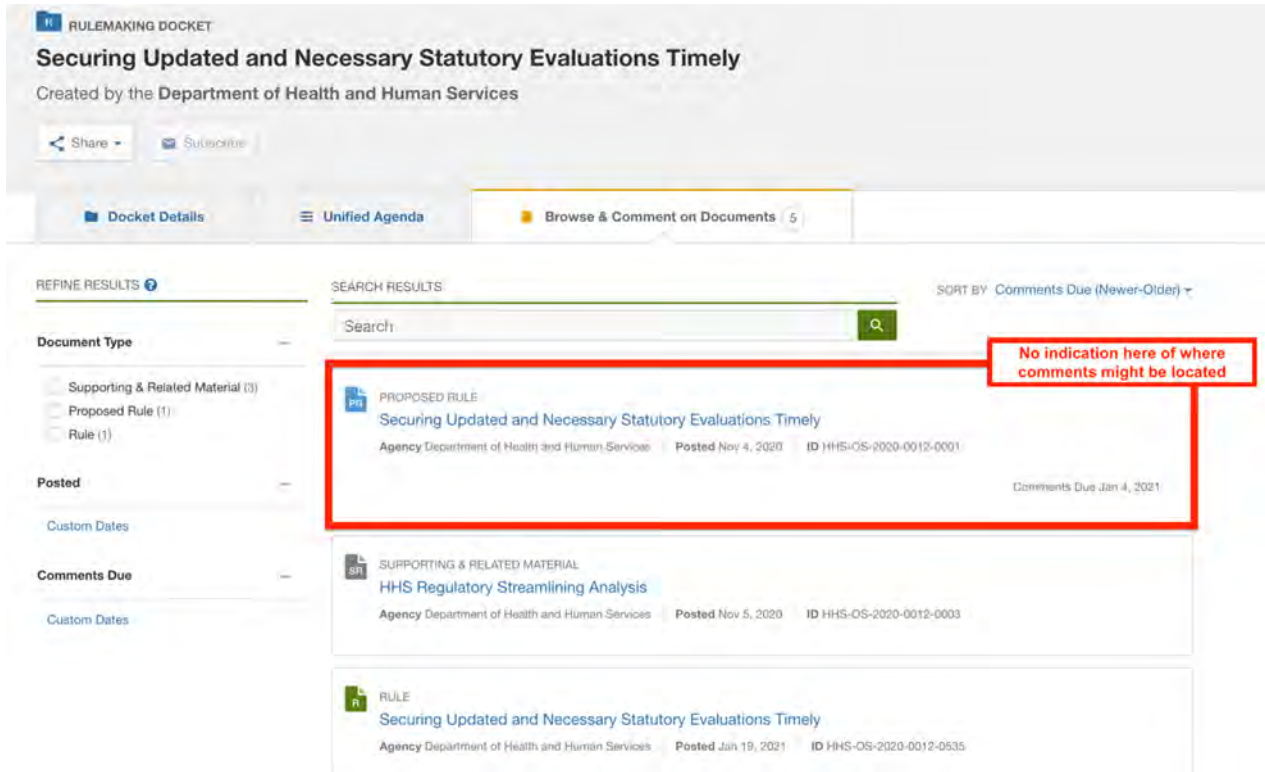
A user might click on the tab that says “Browse & Comment on Documents.” That tab leads to a list of five documents, none of which are comments.¹¹ A “document type” filter on the left lists three document types, but it includes no comment option.¹² The documents listed include no indication that comments might be hidden behind any specific document.¹³

¹⁰ *Id.*

¹¹ <https://www.regulations.gov/docket/HHS-OS-2020-0012/document>.

¹² *Id.*

¹³ *Id.*



By clicking around on the specific documents, a determined user would eventually find that clicking on the “Proposed Rule” document brings up a page with the document text and a new tab that says “Browse comments 530.”¹⁴ By clicking on that tab, one finally discovers a list of 530 comments.¹⁵ One might imagine that the other two comments mentioned on the docket page would be hidden behind other documents, but clicking around does not reveal them. All of these steps could have been skipped if the docket page simply linked to a list of comments.

The most significant barrier comes from attempting to review comments once the comment list has been located because the list provides no relevant data that would allow a user to identify which comments are relevant.

From the comment list on the Sunset Rule, a user finds only a long list of identical entries: “Public Submission Comment on FR Doc # 2020-23888.”¹⁶ There is no information to help users identify relevant comments: no author or organization, no indication of whether the comment came with an attached letter or other supporting material, no indication of whether the commenter supported or opposed the Proposed Rule, and no excerpt from the comment text.¹⁷

Nor is there an option that might help users filter the comments to exclude, for example, comments with no attachments (comments with attachments are usually those that contain the

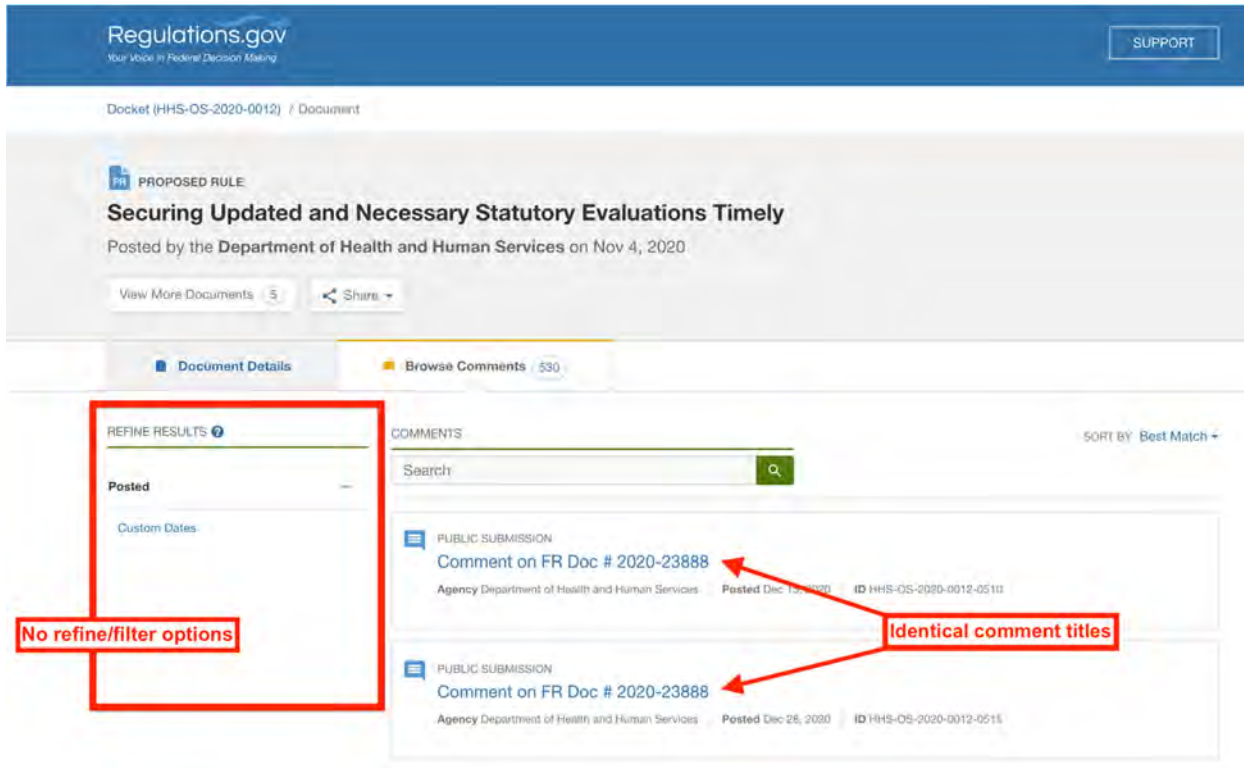
¹⁴ <https://www.regulations.gov/document/HHS-OS-2020-0012-0001>.

¹⁵ <https://www.regulations.gov/document/HHS-OS-2020-0012-0001/comment>.

¹⁶ *Id.*

¹⁷ *Id.*

most thorough and substantive discussions of a proposed rule, crafted by individuals or organizations with direct expertise).



These omissions do not appear to be caused by a lack of data fields for this information. By clicking on a comment and then clicking on a “submitter info” link on the left, a user can see that the website collects information on fields like “Submitter Name” and “Organization Name.”¹⁸

¹⁸ E.g., <https://www.regulations.gov/comment/HHS-OS-2020-0012-0511>.

Regulations.gov
Your Voice in Federal Decision Making

SUPPORT

Docket / Document (HHS-OS-2020-0012-0001) / Comment

PUBLIC SUBMISSION

Comment on FR Doc # 2020-23888

Posted by the Department of Health and Human Services on Dec 28, 2020

View More Comments 530 Share

Comment ID
HHS-OS-2020-0012-0511

Tracking Number
1kA-9ktp-7ip8

Comment Details Submitter Info

Submitter Name
Kathryn

Organization Name
The Joint Commission

Comment

See attached file(s)

Attachments 1

12232020 The Joint Commission Comments re Securing Updated and Necessary Statutory Evaluations Download

This information is simply hidden from the comment list, requiring users to click each individual comment one-by-one to gather this information, rather than presenting it in an organized list. A search bar allows users to search the comments, but that is only useful if the user knows what to search for. An organization like Democracy Forward that wants to find comments by healthcare providers, for example, would need to skim basic comment data to know *which* healthcare providers to search for.

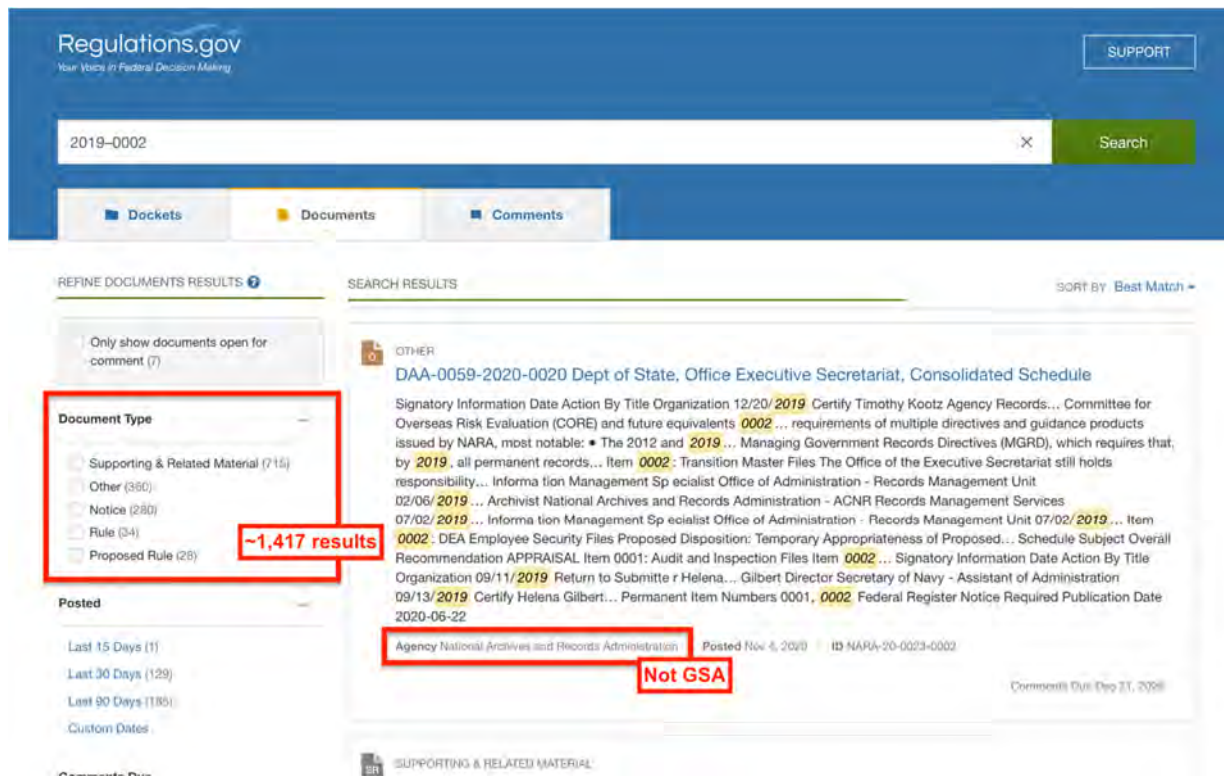
The barrier to reviewing comments for the Sunset Rule is exacerbated because GSA has removed features that previously allowed users to sort comments for themselves.

Unlike the prior version of Regulations.Gov, there is no option to download a CSV spreadsheet index of comments or to bulk download comments so that the user can sort the data for themselves.

So, a user's only option is to manually click through each comment, one by one. The task is more complicated than necessary because (1) the identical comment titles and lack of an obvious number count (which appears only in document IDs), make it difficult to keep track of which comments have been viewed or to divide the task with others, and (2) there is no option to click on an attachment to view it in a browser window and a user must instead download the entire comment to view any of its contents. It takes an average of 4 clicks simply to view the most basic information for each comment. For the Sunset Rule docket, that means over 2,000 clicks—and countless hours—simply to learn basic information that was readily available on the prior version of Regulations.Gov in a downloadable spreadsheet. And to collate the information collected over the course of these 2,000 clicks, a user must manually create their own spreadsheet.

Other docket, such as those maintained by GSA, are even more impossible to navigate.

Our route to accessing the GSA e-docket for its notice seeking comment on updates to Regulations.Gov for the purpose of this letter was similarly labyrinthine, involving multiple false starts and dead-ends, hidden comments, and confusing navigation. The Federal Register notice provides a docket number: 2019-0002.¹⁹ A reasonable user who enters this number into the search bar on Regulations.Gov will not find the docket. Instead, the user will see a list of over 1,000 documents under the “Documents” tab, none of which appear to have anything to do with GSA.²⁰



The Federal Register notice also has a name: Modernizing Services for Regulation Management.²¹ Searching by name does not result in any relevant results under the “docket” tab, but the “documents” tab at least includes some GSA documents along with of tens of thousands of irrelevant documents.²²

¹⁹ 84 Fed. Reg. 72,364.

²⁰ <https://www.regulations.gov/search?filter=2019%E2%80%930002>.

²¹ 84 Fed. Reg. 72,364.

²² <https://www.regulations.gov/search?filter=modernizing%20services%20for%20regulation%20management>.

Modernizing Services for Regulation Management



Search

Dockets

Documents

Comments

REFINE DOCUMENTS RESULTS

SEARCH RESULTS

SORT BY Best Match

Only show documents open for comment (27)

Document Type

- Other (22,947)
- Supporting & Related Material (17,473)
- Rule (2,713)
- Notice (2,660)
- Proposed Rule (2,146)

Posted

- Today (2)
- Last 3 Days (7)
- Last 7 Days (21)
- Last 15 Days (53)
- Last 30 Days (81)
- Last 90 Days (297)

Comments Due

- Today (1)
- Next 3 Days (2)
- Next 7 Days (8)
- Next 15 Days (6)
- Next 30 Days (14)
- Next 90 Days (27)
- Custom Dates

Agency

- Federal Aviation Administration (15,038)
- Environmental Protection Agency (11,851)
- Food and Drug Administration (3,629)
- Department of Transportation (1,667)
- Centers for Medicare&Medicaid Services (1,158)
- Occupational Safety and Health Administration (957)

See More

NOTICE

Meetings: Modernizing Services for Regulation Management

Meetings: *Modernizing Services for Regulation Management* ... ADMINISTRATION [Notice-MR-2020-01; Docket No. 2020-0002; Sequence No. 16] *Modernizing Services for... Regulation Management* AGENCY: Office of *Regulation Management*, Office of Government-wide Policy, General... Background on Electronic Rulemaking *Management* OGP's Office of *Regulation Management manages* two... related to *regulation management* or related to functions that can be applied to *regulation management* ... Schroeder, Director, eRulemaking Program *Management* Office, Office of *Regulation Management*, Office of

Agency General Services Administration | Posted Apr 15, 2020 | ID GSA-GSA-2020-0002-0012

Comments Due Jun 5, 2020

NOTICE

Meetings: Modernizing Services for Regulation Management

Meetings: *Modernizing Services for Regulation Management* ... ADMINISTRATION [Notice-MR-2019-01; Docket No. 2019-0002; Sequence No. 35] *Modernizing Services for... Regulation Management* AGENCY: Office *Regulation Management*, Office of Government-wide Policy (OGP)... The Office of *Regulation Management manages* two programs that deliver shared regulatory IT *services* ... related to *regulation management* or related to functions that can be applied to *regulation management* ... Schroeder, Director, eRulemaking Program *Management* Office, Office of *Regulation Management*, Office

Agency General Services Administration | Posted Dec 31, 2019 | ID GSA-GSA-2019-0002-0025

OTHER

FT Aerial Services, LLC - Exemption/Rulemaking

FT Aerial *Services, LLC* - Exemption/Rulemaking... Petition of FT Aerial *Services, LLC* for Exemption Pursuant to Section 333 of the FAA *Modernization* and... Reform Act of 2012 Dear Sir or Madam, Pursuant to Section 333 of the FAA *Modernization* and Reform... *Regulations* from which Exemption is Requested VI, Public Interest VII, Privacy VIII.... FT Aerial *Services, LLC* is owned/operated by two *managing* members with over 10 years of combined UAS/... *Regulations* from which Exemption is Requested To use a UAS for data collection, FT Aerial *Services*.

Agency Federal Aviation Administration | Posted Jun 18, 2015 | ID FAA-2015-2358-0081



OTHER

Power Support LLC - Exemption/Rulemaking

Emergency *Management* and Disaster Assessments 4..., to utilities and commercial businesses including energy *management services*, asset *management services* ... Extreme weather, vegetation, natural disasters, theft and vandalism are among the many risks that *modern* ... Assessments Regulatory Basis for Exemption Request This request is in accordance with Section 333 of the FAA *Modernization* ... and Reform Act of 2012 (*Modernization Act*) 1 through which Congress acknowledged the use of such systems

Agency Federal Aviation Administration | Posted Mar 16, 2016 | ID FAA-2016-5108-0001



PROPOSED RULE

Food Standards; General Principles and Food Standards Modernization

DEPARTMENT OF AGRICULTURE Food Safety and Inspection *Service* 9 CFR Part 4-10 [Docket No. 95-051P...] RIN 0583-AC72 DEPARTMENT OF HEALTH AND HUMAN *SERVICES* Food and Drug Administration 21 CFR... SUMMARY) The Food Safety and Inspection *Service* (FSIS) and the Food and Drug Administration (FDA) (... * Mail/Hand delivery/Courier (For paper, disk, or CD-ROM submissions): Division of Dockets *Management*... Options in the Food St&ndards *Modernization* Process F... Published FR: Food Standards: General Principles and Food Standards *Modernization* ... *Services*) in response to its ANPRM.... To be most effective, comments should be sent to the Office of *Management* and Budget (OMB) within 30... Received comments may be seen in the Division of Dockets *Management* between 9 a.m. and 4 p.m., Monday... Department of agriculture: Food safety and inspection *service*: Department of health and human *services* ... *Department Of Agriculture: Food Safety And Inspection *Service*: Department Of Health And Human *Services*

Agency Food and Drug Administration | Posted May 24, 2005 | ID FDA-1995-N-0068 (016)



The first two documents listed, both called “Meetings: Modernizing Services for Regulation Management,” appear to be associated with the notice; the second document listed has the correct date and has a document ID of GSA-GSA-2019-0002-0025, suggesting that the docket number in the Federal Register was incomplete.²³ A user might then click on that document. The document says it is a “Notice of public meeting and request for comment” and there is a “Browse Comments” tab that has a number “1” in it.²⁴ But if the user clicks on the comment tab and then on the only listed comment, one can see that it concerns dogs on airplanes (indicating we were clearly not in the correct place).²⁵

The screenshot shows a GSA notice page. At the top, it says "NOTICE" and "Meetings: Modernizing Services for Regulation Management". Below that, it says "Posted by the General Services Administration on Dec 31, 2019". There are buttons for "View More Documents" and "Share". A red box highlights the "Browse Comments" tab, which has a "1" next to it. Another red box highlights a comment that says "Comment here is not related to relevant GSA notice". The main content area has sections for "Action", "Summary", and "Dates".

Document ID
GSA-GSA-2019-0002-0025

Comments Received
1 | [More Details](#)

Document Details

Comment Due Date
Jun 5, 2020

Federal Register Number
2019-28042

CFR
0

Subject
Meetings: Modernizing Services for Regulation Management

Action
Notice of public meetings and request for comment.

Summary
GSA is seeking public comment on any matters related to the modernization of Electronic Rulemaking Management. Background information on specific topics will be provided in electronic format through the *regulations.gov* docketing system to help inform the public on known issues around which to focus their input. Comments will also be accepted electronically.

To further inform the public on issues affecting the future of Electronic Rulemaking Management, GSA is hosting two town-hall style public meetings. In addition to inviting members of the public to attend these meetings, GSA is seeking subject matter experts who would be interested in participating in one or more panels at these meetings. Further information regarding the public meetings, the process for requesting to present, and the comment process may be found under the heading SUPPLEMENTARY INFORMATION.

Dates
The public meetings will be conducted on January 30 and March 25, 2020. Both meetings will be held from 2:00 p.m. to 4:00 p.m., Eastern Time (ET).

Subject matter experts interested in serving on a panel at one or more public meetings must submit their proposed topics and qualifications/experience, in the form of a resume, for the relevant subject area no later than the following dates:

For the meeting on January 30, 2020, proposals are due midnight January 10, 2020.

For the meeting on March 25, 2020, proposals are due midnight March 2, 2020.

²³ *Id.*

²⁴ <https://www.regulations.gov/document/GSA-GSA-2019-0002-0025>.

²⁵ <https://www.regulations.gov/comment/GSA-GSA-2019-0002-0027>.

PUBLIC SUBMISSION

Comment on FR Doc # 2019-28242

Posted by the General Services Administration on Jan 29, 2020

Share

Comment ID
GSA-GSA-2019-0002-0027

Tracking Number
1k4-9oo3-5hyq

Comment Details **Submitter Info**

Document Subtype
Public Comment

Over the years I've talked to many people who are more interested in getting free flights for their pets and will do whatever they can to make it happen. They tell how cheap and easy it is to go on-line and get whatever paperwork they need without the animal meeting any standards from a local animal veterinarian. True, well educated and trained service dogs, especially guide dogs for the blind, are never a problem - even for those of us who have allergies to animals as somehow we will make it work. Beyond that I say NO.

Please, if this is to happen, have a national computer animal register program such as we have with the T.S.A. Also, please consider having the dogs allowed in only special areas of the airplane so that those of us with allergies - or fear of dogs - can have some distance between them and us. No way do I feel that an upright honest paying passenger should be delayed and need to take another flight because of someone's pet.

The user might then back out to the document page again. There is a tiny, easy-to-miss link at the top that says "Docket (GSA-GSA-2019-0002)."²⁶

Regulations.gov
Your Voice in Federal Decision Making

SUPPORT

Docket (GSA-GSA-2019-0002) / Document

NOTICE

Meetings: Modernizing Services for Regulation Management

Posted by the General Services Administration on Dec 31, 2019

View More Documents 32 Share

Document Details **Browse Comments** 1

Document ID
GSA-GSA-2019-0002-0025

Comments Received
18
More Details

Document Details

Comment Due Date
Jun 5, 2020

Federal Register Number
2019-28242

Content

Action
Notice of public meetings and request for comment.

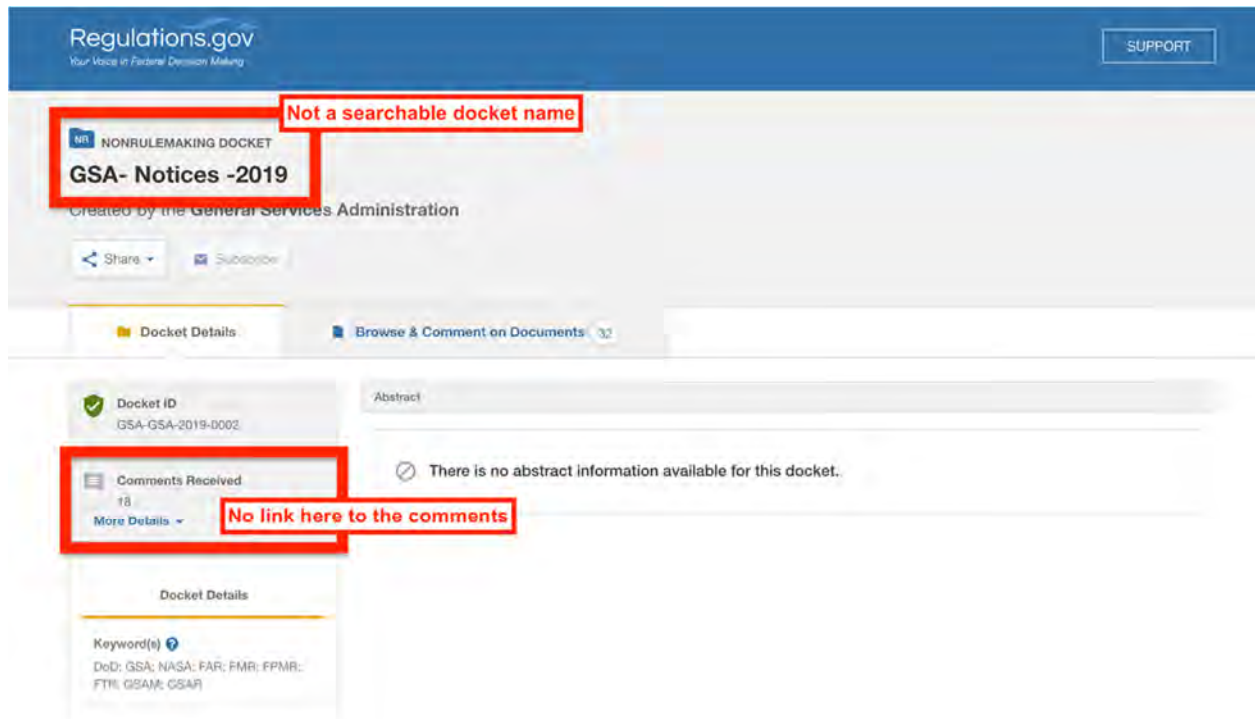
Summary
GSA is seeking public comment on any matters related to the modernization of Electronic Rulemaking Management. Background information on specific topics will be provided in electronic format through the *regulations.gov* docketing system to help inform the public on known issues around which to focus their input. Comments will also be accepted electronically.

To further inform the public on issues affecting the future of Electronic Rulemaking Management, GSA is hosting two town-hall style public meetings. In addition to inviting members of the public to attend these meetings, GSA is seeking subject matter experts who would be interested in participating in one or more panels at these meetings. Further information regarding the public meetings, the process for requesting to present, and the comment process may be found under the heading SUPPLEMENTARY INFORMATION.

Dates

²⁶ <https://www.regulations.gov/document/GSA-GSA-2019-0002-0025>.

This, finally, directs the user to a docket page.²⁷ The docket is vaguely named “GSA-Notices -2019” (which provides one possible explanation why it did not come up in the title search) and, like the Sunset Rule docket, contains no description.²⁸ A box on the left says “Comments Received 18,” but, again, like with the Sunset Rule docket, there is no link to the comments.²⁹



Clicking over to a tab that says “Browse & Comment on Documents 32” displays, in addition to the same document previously viewed, documents that one can easily see have nothing to do with the notice, such as one entitled “Environmental Impact Statements; Availability, etc.: Chet Holifield Federal Building in Laguna Niguel, CA.”³⁰

²⁷ <https://www.regulations.gov/docket/GSA-GSA-2019-0002>.

²⁸ *Id.*

²⁹ *Id.*

³⁰ <https://www.regulations.gov/docket/GSA-GSA-2019-0002/document>.

NONRULEMAKING DOCKET

GSA- Notices -2019

Created by the General Services Administration

Share | Subscribe

Docket Details | Browse & Comment on Documents 32

REFINE RESULTS | SEARCH RESULTS | SORT BY Comments Due (Newer-Older)

Document Type: Notice (25), Supporting & Related Material (7)

Posted: Custom Dates

Comments Due: Custom Dates

NOTICE
Meetings: Modernizing Services for Regulation Management
Agency General Services Administration | Posted Dec 31, 2019 | ID GSA-GSA-2019-0002-0025
Comments Due Jun 5, 2020

NOTICE
Environmental Impact Statements; Availability, etc.: Chet Holifield Federal Building in Laguna Niguel, CA
Agency General Services Administration | Posted Nov 15, 2019 | ID GSA-GSA-2019-0002-0022
Comments Due Dec 10, 2019

NOTICE
Privacy Act; Systems of Records
Agency General Services Administration | Posted Oct 5, 2019 | ID GSA-GSA-2019-0002-0018
Comments Due Nov 7, 2019

NOTICE
Environmental Impact Statements; Availability, etc.: Construction of a New U.S. Land Port of Entry in Madawaska, ME, and a New Madawaska-Edmundston International Bridge
Agency General Services Administration | Posted Oct 4, 2019 | ID GSA-GSA-2019-0002-0017
Comments Due Nov 4, 2019

NOTICE
Agency Information Collection Activities; Proposals, Submissions, and Approvals; Qualification Requirements
Agency General Services Administration | Posted Jul 30, 2019 | ID GSA-GSA-2019-0002-0013
Comments Due Aug 29, 2019

NOTICE
Environmental Assessments; Availability, etc.: Appraisers Building and U.S. Customs House, San Francisco, CA
Agency General Services Administration | Posted Jul 30, 2019 | ID GSA-GSA-2019-0002-0015
Comments Due Aug 26, 2019

NOTICE
Meetings: Final Environmental Assessment for the Edward J. Schwartz Federal Building Structural Enhancements Project in San Diego, CA
Agency General Services Administration | Posted Jul 30, 2019 | ID GSA-GSA-2019-0002-0014
Comments Due Aug 26, 2019

Annotations: Red boxes around entries with "Not relevant" labels and red "X" or "?" marks.

Ultimately, after finding the correct page for this rulemaking docket,³¹ the page alerts users to 18 comments submitted to GSA, but we could find no way to access 17 of those 18. Any reasonable user would be at a loss to know whether those comments exist or are available on Regulations.Gov at all.

³¹ <https://www.regulations.gov/docket/GSA-GSA-2019-0002>.

APPENDIX B: Technical Problems with Regulations.Gov API

This narrative details how GSA policies and technological problems with the Regulations.Gov API make it impossible for an external web application to effectively use the API to better present regulatory data.

The API keys issued by Data.Gov for the eRulemaking Program artificially restrict the number of API requests allowed in a given time period that external websites can make for Regulations.Gov data. The eRulemaking Program initially employs the default Data.Gov rate limit of 1,000 “calls” per hour with each API key.¹ This means that an external website can request no more than 1,000 pieces of data in an hour. If an external website exceeds this limit, the external website will be temporarily blocked by Regulations.Gov until the hour passes.²

While web developers may request an increase to this limit, experience shows that, under an informal policy established during the Trump administration, the eRegulations Program denies all such requests through what can only be described as bureaucratic runaround. A web developer wishing to build a workaround application recently requested a rate limit increase to 6,000 calls per hour and included his analysis of the technological need for the increase.³ Nine days later, he was told that his rate limit could be increased only to 2,000 calls per hour because “we are not increasing rate limits beyond 2,000 requests/hour at this time.”⁴ Then, two weeks after that, he was informed with no explanation that his rate limit had been reverted to 1,000 calls per hour.⁵ Upon inquiry, he was told that “Rate increase requests that are approved are approved for a two-week time limit at the higher amount. After two weeks the key reverts back to the default 1000 calls per hour.”⁶

GSA’s refusal to permanently increase the 1,000 call-per-hour limit for a given API key upon request obliterates the value of GSA’s promise that an API key “will allow users to find creative ways to present regulatory data.” For many rulemaking dockets, it is barely enough for an external website to access a single docket in an hour. Take, for example, Docket No. HHS-OS-2020-0012, the docket for the recently stayed Sunset Rule. The e-docket contains the docket itself, the proposed rule, the final rule, three supporting documents, and 530 comment submissions. A single API “call” can retrieve a list of up to 250 comments for a given document. But because those results do not include sufficient information for a user to make a determination about whether to view detail for the comments (i.e., there is no one-stop list of basic information like author, organization, the existence of attachments, or a preview of the comment text), a third-party application would need to separately “call” the api.Regulation.Gov server 535 times (once for the docket, once for the documents on the docket, three times for the

¹ The Regulations.Gov API webpage says that the limit is 500 calls per hour for “commenting.” See <https://open.gsa.gov/api/regulationsgov/> (last visited May 6, 2021). But that page directs users to API.Data.Gov, which says that the limit is 1,000 calls per hour. See <https://api.data.gov/docs/rate-limits/> (last visited May 6, 2021).

² See <https://api.data.gov/docs/rate-limits/>.

³ Attachment D at 1 (email exchange with eRulemaking Program).

⁴ *Id.* at 2.

⁵ *Id.* at 5.

⁶ *Id.* at 5.

comment list on the proposed rule document, and once for each individual comment) simply to generate an index comparable to what used to be readily accessible through the old version of the website, giving a user a hint about whether they may want to view the full comment.

A third-party website using such an API key would not be able to support a single user that needs to access more than one e-docket the size of the Sunset Rule docket in an hour, much less multiple users. And the Sunset Rule is not a particularly extreme example; consider Docket No. HHS-OCR-2019-0007-0001, the docket for a proposed rule under Section 1557 of the Patient Protection and Affordable Care Act. That e-docket contains a proposed rule and 155,966 comments. For an external website to display an index with basic descriptions of these items would require 155,971 separate calls to Regulations.Gov. The artificial rate limit means that it would take an external website 156 hours—or 6 1/2 days—to simply provide users with a usable index of an e-docket’s contents.

The rate limit problem is exacerbated by the agencies’ poor and inconsistent use of critical comment detail data fields. For example, on the docket for the Sunset Rule discussed above, the data in the “title” field is the same for every comment (“Public Submission Comment on FR Doc # 2020-23888”),⁷ and the comments themselves have data in the fields for “Submitter Name” and “Organization Name.”⁸ But on Docket No. EPA-HQ-OPP-2019-0080, the docket for a rulemaking by the Environmental Protection Agency, the agency has inexplicably listed the author and organization in the title of the comments and left the fields for author and organization blank.⁹ A machine cannot sort or filter data in any meaningful way when the data fields are used in such drastically different ways.

And the ability of a third-party web application to use information from the comment data fields (even if the agencies were to use the fields properly) is further impeded by the improper sorting and filtering options in the API and the insufficient data that api.Regulations.Gov provides in response to an API call for a comment list. For example, when a third-party machine requests a list of comments for document FAA-2018-1084-0001 (objectId 0900006483a6cba3), the information returned includes the following fields for each comment:

- "documentType" : "Public Submission"
- "lastModifiedDate" : "2019-03-18T14:29:30Z"
- "highlightedContent" : ""
- "withdrawn" : false
- "agencyId" : "FAA"
- "title" : "Comment from Jeramie Scott"
- "objectId" : "0900006483aed8d8"
- "postedDate" : "2019-03-18T04:00:00Z"¹⁰

⁷ <https://www.regulations.gov/document/HHS-OS-2020-0012-0001/comment>

⁸ *E.g.*, <https://www.regulations.gov/comment/HHS-OS-2020-0012-0511>.

⁹ <https://www.regulations.gov/document/EPA-HQ-OPPT-2019-0080-0001/comment>;
<https://www.regulations.gov/comment/EPA-HQ-OPPT-2019-0080-0559>.

¹⁰ For a look at the returned information in raw form, see [https://api.regulations.gov/v4/comments?filter\[commentOnId\]=0900006483a6cba3&api_key=DEMO_KEY](https://api.regulations.gov/v4/comments?filter[commentOnId]=0900006483a6cba3&api_key=DEMO_KEY).

This means that a third-party application can make a single API call to generate an index of comments that contains this data. But these fields do not contain adequate information for a user to make an informed decision about whether to view the comment in detail. Specifically, it does not include fields for author, organization, comment text, or whether the comment has an attachment. Unless the server includes more fields in the comment list request, a third-party website must make a new call for each individual comment, in order to generate a usable comment index. Notably, this example also illustrates how the inconsistent use of data fields is problematic. While the comment author is clearly visible to the human eye in the “title” field, a machine is not capable of parsing the name from the rest of the text accurately, particularly when the format of the description changes between agencies.

Attachment A

Docket ID	Docket Title	Agency	Docket Type	Petition Number	RIN					
PHMSA-2011-0023	Pipeline Safety: Safety of Gas Transmission	PHMSA	Rulemaking	N/A	Not Assigned					
Document Title	Document Type	Attachment Count	Submitter Last Name	Submitter First Name	Organization	Document ID	Document SubType	File Type	Number Of Pages	Document Detail
Interstate Natural Gas Association of America - Letter	OTHER	1	N/A	N/A	N/A	PHMSA-2011-0023-0021	Acknowledgement	xml	1	https://www.regulations.gov/document?D=PHMSA-2011-0023-0021
Comment from Alessandro Demma	PUBLIC SUBMISSIONS	1	Demma	Alessandro	A3 Monitoring	PHMSA-2011-0023-0188	Comment(s)	pdf	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0188
Accufacts Inc. - Comments	PUBLIC SUBMISSIONS	1	Kuprewicz	Richard	Accufacts Inc.	PHMSA-2011-0023-0073	Comment(s)	N/A	1	https://www.regulations.gov/document?D=PHMSA-2011-0023-0073
Comment from PHMSA - GPAC June 2017 - Industry Comments FINAL (8-2-17)	PUBLIC SUBMISSIONS	1	Osman	C.J.	AGA, API and INGAA	PHMSA-2011-0023-0441	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0441
Comment from Peg Conway	PUBLIC SUBMISSIONS	N/A	Conway	Peg	N/A	PHMSA-2011-0023-0257	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0257
Comment from Rick & Theresa Scholl	PUBLIC SUBMISSIONS	1	Scholl	Rick & Theresa	N/A	PHMSA-2011-0023-0380	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0380
Comment from M. Sushore	PUBLIC SUBMISSIONS	N/A	Sushore	M.	N/A	PHMSA-2011-0023-0313	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0313
Comment from David Alleyne	PUBLIC SUBMISSIONS	N/A	Alleyne	David	N/A	PHMSA-2011-0023-0125	Comment(s)	N/A	1	https://www.regulations.gov/document?D=PHMSA-2011-0023-0125
Comment from North Dakota Petroleum Council	PUBLIC SUBMISSIONS	1	Cutting	Kara	N/A	PHMSA-2011-0023-0432	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0432
Comments of Gas Pipeline Advisory Committee Meeting on the Safety of Gas Transmission & Gathering Lines	PUBLIC SUBMISSIONS	1	Kurilla	Erin	AGA, INGAA, & API	PHMSA-2011-0023-0439	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0439
Air Products and Chemicals, Inc. - Comments	PUBLIC SUBMISSIONS	1	Gutacker	Andrew	Air Products and Chemicals, Inc.	PHMSA-2011-0023-0075	Comment(s)	pdf	1	https://www.regulations.gov/document?D=PHMSA-2011-0023-0075
Comment from Nancy Dawley	PUBLIC SUBMISSIONS	N/A	Dawley	Nancy	N/A	PHMSA-2011-0023-0198	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0198
Comment from Mary Friend	PUBLIC SUBMISSIONS	1	Friend	Mary	N/A	PHMSA-2011-0023-0320	Comment(s)	pdf	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0320
Alaska Dept. of Natural Resources - Comment	PUBLIC SUBMISSIONS	1	Balash	Joe	Alaska Dept. of Natural Resources	PHMSA-2011-0023-0016	N/A	pdf	0	https://www.regulations.gov/document?D=PHMSA-2011-0023-0016
Stephen and Tina Henning - Comments	OTHER	1	N/A	N/A	N/A	PHMSA-2011-0023-0106	Acknowledgement	N/A	1	https://www.regulations.gov/document?D=PHMSA-2011-0023-0106
John J. Tintera - Comment	PUBLIC SUBMISSIONS	1	Tintera	John	N/A	PHMSA-2011-0023-0015	N/A	N/A	0	https://www.regulations.gov/document?D=PHMSA-2011-0023-0015
Comment from David Eigel	PUBLIC SUBMISSIONS	1	Eigel	David	N/A	PHMSA-2011-0023-0201	Comment(s)	docx	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0201
Comment from Karen Cash	PUBLIC SUBMISSIONS	1	Cash	Karen	N/A	PHMSA-2011-0023-0222	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0222
Comment from John Dunne	PUBLIC SUBMISSIONS	1	Dunne	John	N/A	PHMSA-2011-0023-0219	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0219
Comment from Thomas M Lael	PUBLIC SUBMISSIONS	1	Lael	Thomas M	N/A	PHMSA-2011-0023-0208	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0208
Alliance Pipeline - Comment	PUBLIC SUBMISSIONS	1	McGrath	Michael	Alliance Pipeline	PHMSA-2011-0023-0047	Comment(s)	N/A	1	https://www.regulations.gov/document?D=PHMSA-2011-0023-0047
Comment from Monika Blazs	PUBLIC SUBMISSIONS	N/A	Blazs	Monika	N/A	PHMSA-2011-0023-0369	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0369
Comment from Richard Sublett	PUBLIC SUBMISSIONS	1	Sublett	Richard	Alliant Energy on behalf of Interstate Power & Light Co. and Wisconsin Power & Light	PHMSA-2011-0023-0307	Comment(s)	docx	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0307
American Gas Association - Comments	PUBLIC SUBMISSIONS	2	Bennett	Phillip	American Gas Association	PHMSA-2011-0023-0086	Comment(s)	N/A	1	https://www.regulations.gov/document?D=PHMSA-2011-0023-0086
Comment from James O'Reilly	PUBLIC SUBMISSIONS	N/A	O'Reilly	James	N/A	PHMSA-2011-0023-0377	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0377
Comment from Anonymous	PUBLIC SUBMISSIONS	N/A	Anonymous	Anonymous	N/A	PHMSA-2011-0023-0149	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0149
Comment from Harry Bennett	PUBLIC SUBMISSIONS	N/A	Bennett	Harry	N/A	PHMSA-2011-0023-0286	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0286
Comment from Erin Kurilla	PUBLIC SUBMISSIONS	1	Kurilla	Erin	American Gas Association	PHMSA-2011-0023-0340	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0340
Pipeline Safety: Safety of Gas Transmission Pipelines	PROPOSED RULES	N/A	N/A	N/A	N/A	PHMSA-2011-0023-0008	Advance Notice of	html	1	https://www.regulations.gov/document?D=PHMSA-2011-0023-0008
Comment from Jesse Martus	PUBLIC SUBMISSIONS	N/A	Martus	Jesse	N/A	PHMSA-2011-0023-0434	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0434
Comment from Eric Kozak	PUBLIC SUBMISSIONS	1	Kozak	Eric	N/A	PHMSA-2011-0023-0314	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0314
Comment from Debby Christy	PUBLIC SUBMISSIONS	1	Christy	Debby	N/A	PHMSA-2011-0023-0170	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0170
Richard and Alison Rupert - Comment	PUBLIC SUBMISSIONS	N/A	Rupert	Richard and Alison	N/A	PHMSA-2011-0023-0039	Comment(s)	N/A	1	https://www.regulations.gov/document?D=PHMSA-2011-0023-0039
TECO Peoples Gas - Comments	PUBLIC SUBMISSIONS	1	Weidley	Todd	N/A	PHMSA-2011-0023-0424	Comment(s)	pdf	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0424
Michael and Noree Kolman - Comment	PUBLIC SUBMISSIONS	1	N/A	N/A	N/A	PHMSA-2011-0023-0107	Comment(s)	N/A	1	https://www.regulations.gov/document?D=PHMSA-2011-0023-0107
Kansas Department of Health and Environment - Comments	PUBLIC SUBMISSIONS	1	Cochran	Michael	N/A	PHMSA-2011-0023-0012	Comment(s)	N/A	1	https://www.regulations.gov/document?D=PHMSA-2011-0023-0012
Comment from Paulette Page	PUBLIC SUBMISSIONS	N/A	Page	Paulette	N/A	PHMSA-2011-0023-0275	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0275
American Gas Association - Comments	PUBLIC SUBMISSIONS	2	Bennett	Philip	American Gas Association	PHMSA-2011-0023-0087	Comment(s)	N/A	1	https://www.regulations.gov/document?D=PHMSA-2011-0023-0087
Comment from Tom Correll	PUBLIC SUBMISSIONS	1	Correll	Tom	N/A	PHMSA-2011-0023-0325	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0325
Meryl Solar - Comments	PUBLIC SUBMISSIONS	N/A	Solar	Meryl	N/A	PHMSA-2011-0023-0093	Comment(s)	N/A	1	https://www.regulations.gov/document?D=PHMSA-2011-0023-0093
Comment from Stephen Clark	PUBLIC SUBMISSIONS	1	Clark	Stephen	N/A	PHMSA-2011-0023-0358	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0358
Comment from Beverly Edwards	PUBLIC SUBMISSIONS	N/A	Edwards	Beverly	N/A	PHMSA-2011-0023-0243	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0243

Comment from Erin Kurilla	PUBLIC SUBMISSIONS	1	Kurilla	Erin	American Gas Association	PHMSA-2011-0023-0339	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0339
Comment from Elizabeth Rueve-Miller	PUBLIC SUBMISSIONS	N/A	Rueve-Miller	Elizabeth	N/A	PHMSA-2011-0023-0270	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0270
Comment from David Paquette	PUBLIC SUBMISSIONS	N/A	Paquette	David	N/A	PHMSA-2011-0023-0185	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0185
U.S. DOT/PHMSA - Meeting with PHMSA and INGAA to discuss comments on Pipeline Safety: Safety of Gas Transmission Pipelines	OTHER	1	N/A	U.S. DOT/PHMSA	N/A	PHMSA-2011-0023-0114	Supplemental Co	N/A	1	https://www.regulations.gov/document?D=PHMSA-2011-0023-0114
Amy Payne - Comments	PUBLIC SUBMISSIONS	1	Payne	Amy	N/A	PHMSA-2011-0023-0068	Comment(s)	N/A	1	https://www.regulations.gov/document?D=PHMSA-2011-0023-0068
Comment from Rus Plant	PUBLIC SUBMISSIONS	1	Plant	Rus	N/A	PHMSA-2011-0023-0234	Comment(s)	pdf	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0234
Phillip Bennett - Comment	PUBLIC SUBMISSIONS	2	Bennett	Phillip	American Gas Association	PHMSA-2011-0023-0017	Comment(s)	N/A	1	https://www.regulations.gov/document?D=PHMSA-2011-0023-0017
Comment from Mark Nolan	PUBLIC SUBMISSIONS	1	Nolan	Mark	N/A	PHMSA-2011-0023-0212	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0212
Laura Gingher - Comment	PUBLIC SUBMISSIONS	N/A	Gingher	Laura	N/A	PHMSA-2011-0023-0040	Comment(s)	N/A	1	https://www.regulations.gov/document?D=PHMSA-2011-0023-0040
Comment from Heidi Keller	PUBLIC SUBMISSIONS	2	Keller	Heidi	American Petroleum Institute	PHMSA-2011-0023-0381	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0381
Independent Petroleum Association of America, its Cooperating Associations, and the American Petroleum Institute - Pipeline Safety: Safety of Gas Transmission Pipelines - Comments	PUBLIC SUBMISSIONS	1	Airey	W.	N/A	PHMSA-2011-0023-0058	Comment(s)	pdf	1	https://www.regulations.gov/document?D=PHMSA-2011-0023-0058
Comment from Anonymous Anonymous	PUBLIC SUBMISSIONS	1	Anonymous	Anonymous	Anonymous	PHMSA-2011-0023-0415	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0415
Comment from anonymous	PUBLIC SUBMISSIONS	1	anonymous	anonymous	anonymous	PHMSA-2011-0023-0422	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0422
Comment from Timothy Diaspro	PUBLIC SUBMISSIONS	N/A	Diaspro	Timothy	N/A	PHMSA-2011-0023-0414	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0414
American Petroleum Institute - Comment	OTHER	2	Emmert	Amy	American Petroleum Institute	PHMSA-2011-0023-0115	Supplemental Co	pdf	1	https://www.regulations.gov/document?D=PHMSA-2011-0023-0115
Comment from Bobbie Leitner	PUBLIC SUBMISSIONS	N/A	Leitner	Bobbie	N/A	PHMSA-2011-0023-0235	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0235
Comment from Abraham Amoros	PUBLIC SUBMISSIONS	N/A	Amoros	Abraham	N/A	PHMSA-2011-0023-0199	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0199
Comment from John Erickson	PUBLIC SUBMISSIONS	1	Erickson	John	American Public Gas	PHMSA-2011-0023-0293	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0293
Comment from Joane Gerson	PUBLIC SUBMISSIONS	N/A	Gerson	Joane	N/A	PHMSA-2011-0023-0191	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0191
Theodore Carl Stroter - Comments	PUBLIC SUBMISSIONS	N/A	Stroter	Theodore	N/A	PHMSA-2011-0023-0097	Comment(s)	N/A	1	https://www.regulations.gov/document?D=PHMSA-2011-0023-0097
American Public Gas Association - Comments	PUBLIC SUBMISSIONS	1	Erickson	John	American Public Gas Association	PHMSA-2011-0023-0054	Comment(s)	N/A	1	https://www.regulations.gov/document?D=PHMSA-2011-0023-0054
Comment from Frank Selig	PUBLIC SUBMISSIONS	N/A	Selig	Frank	N/A	PHMSA-2011-0023-0163	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0163
Comment from Joe Hyclak	PUBLIC SUBMISSIONS	1	Hyclak	Joe	N/A	PHMSA-2011-0023-0147	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0147
Gas Pipeline Advisory Committee Meeting Pre-briefing on December 5	OTHER	1	N/A	N/A	N/A	PHMSA-2011-0023-0442	Assessment Docu	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0442
Anonymous - Comments	PUBLIC SUBMISSIONS	1	N/A	Anonymous	N/A	PHMSA-2011-0023-0057	Comment(s)	N/A	1	https://www.regulations.gov/document?D=PHMSA-2011-0023-0057
Comment from Nancy Sullivan	PUBLIC SUBMISSIONS	N/A	Sullivan	Nancy	N/A	PHMSA-2011-0023-0190	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0190
Laborers' International Union of North America - Comments	PUBLIC SUBMISSIONS	1	Sullivan	Terry	N/A	PHMSA-2011-0023-0436	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0436
Comment from Paul Wohlfarth	PUBLIC SUBMISSIONS	N/A	Wohlfarth	Paul	N/A	PHMSA-2011-0023-0177	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0177
Comment from Paul Fieber	PUBLIC SUBMISSIONS	N/A	Fieber	Paul	N/A	PHMSA-2011-0023-0396	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0396
Atmos Energy Corporation - Comment	PUBLIC SUBMISSIONS	1	Murdock, P.E.	Phillip	Atmos Energy Corporation	PHMSA-2011-0023-0038	Comment(s)	N/A	1	https://www.regulations.gov/document?D=PHMSA-2011-0023-0038
Comment from Matthew Hite	PUBLIC SUBMISSIONS	1	Hite	Matthew	N/A	PHMSA-2011-0023-0290	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0290
Comment from John Dunne	PUBLIC SUBMISSIONS	1	Dunne	John	N/A	PHMSA-2011-0023-0244	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0244
Avista Corporation - Comment	PUBLIC SUBMISSIONS	1	Faulkenberry	Michael	Avista Corporation	PHMSA-2011-0023-0108	Comment(s)	pdf	0	https://www.regulations.gov/document?D=PHMSA-2011-0023-0108
Comment from anonymous	PUBLIC SUBMISSIONS	1	anonymous	anonymous	anonymous	PHMSA-2011-0023-0421	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0421
Comment from Paul Gierosky	PUBLIC SUBMISSIONS	1	Gierosky	Paul	N/A	PHMSA-2011-0023-0254	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0254
Kim Shaffer - Comment	PUBLIC SUBMISSIONS	N/A	Shaffer	Kim	N/A	PHMSA-2011-0023-0045	Comment(s)	N/A	1	https://www.regulations.gov/document?D=PHMSA-2011-0023-0045
Comment from Landon Haack	PUBLIC SUBMISSIONS	1	Haack	Landon	Black Hills Energy	PHMSA-2011-0023-0350	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0350
Comment from Dan Keck	PUBLIC SUBMISSIONS	N/A	Keck	Dan	N/A	PHMSA-2011-0023-0141	Comment(s)	N/A	1	https://www.regulations.gov/document?D=PHMSA-2011-0023-0141
Comment from VETO BARZILOSKI	PUBLIC SUBMISSIONS	N/A	BARZILOSKI	VETO	N/A	PHMSA-2011-0023-0215	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0215
Carmalene Christine Churba - Comments	PUBLIC SUBMISSIONS	N/A	Churba	Carmalene	N/A	PHMSA-2011-0023-0085	Comment(s)	N/A	1	https://www.regulations.gov/document?D=PHMSA-2011-0023-0085
Comment from Hope Taylor	PUBLIC SUBMISSIONS	N/A	Taylor	Hope	N/A	PHMSA-2011-0023-0409	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0409
Comment from Carolyn Reilly	PUBLIC SUBMISSIONS	1	Reilly	Carolyn	Blue Ridge Environmental Defense League	PHMSA-2011-0023-0402	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0402
Comment from Francis Peverly	PUBLIC SUBMISSIONS	1	Peverly	Francis	N/A	PHMSA-2011-0023-0296	Comment(s)	pdf	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0296
Comment from Linda Gerson	PUBLIC SUBMISSIONS	N/A	Gerson	Linda	N/A	PHMSA-2011-0023-0203	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0203
Comment from Mary Lee	PUBLIC SUBMISSIONS	N/A	Lee	Mary	N/A	PHMSA-2011-0023-0312	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0312
Comment from Jared Ellsworth	PUBLIC SUBMISSIONS	1	Ellsworth	Jared	N/A	PHMSA-2011-0023-0263	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0263
Comment from Blayne Ilkuf	PUBLIC SUBMISSIONS	N/A	Ilkuf	Blayne	N/A	PHMSA-2011-0023-0152	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0152
Comment from Marco Bracamonte	PUBLIC SUBMISSIONS	1	Bracamonte	Marco	Boardwalk Pipeline Partners,	PHMSA-2011-0023-0342	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0342

Comment from Willie Rivera	PUBLIC SUBMISSIONS	1	Rivera	Willie	California Independent Petroleum Association	PHMSA-2011-0023-0315	Comment(s)	pdf	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0315
Comment from Paul Blanch	PUBLIC SUBMISSIONS	1	Blanch	Paul	N/A	PHMSA-2011-0023-0327	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0327
Comment from Stephany Larson	PUBLIC SUBMISSIONS	N/A	Larson	Stephany	N/A	PHMSA-2011-0023-0171	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0171
Comment from Jeff Wasden	PUBLIC SUBMISSIONS	N/A	Wasden	Jeff	N/A	PHMSA-2011-0023-0269	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0269
Comment from Susan Dowling Reuterskiold	PUBLIC SUBMISSIONS	N/A	Dowling Reuterskiold	Susan	N/A	PHMSA-2011-0023-0395	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0395
Comment from Anonymous	PUBLIC SUBMISSIONS	1	Anonymous	Anonymous	N/A	PHMSA-2011-0023-0192	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0192
California Public Utilities Commission - Comments	PUBLIC SUBMISSIONS	1	Berdge	Patrick	California Public Utilities Commission	PHMSA-2011-0023-0063	Comment(s)	N/A	1	https://www.regulations.gov/document?D=PHMSA-2011-0023-0063
Comment from Jonathan Strong	PUBLIC SUBMISSIONS	1	Strong	Jonathan	N/A	PHMSA-2011-0023-0173	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0173
Comment from Deb Adkins	PUBLIC SUBMISSIONS	1	Adkins	Deb	N/A	PHMSA-2011-0023-0247	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0247
Comment from Joel Myler	PUBLIC SUBMISSIONS	1	Myler	Joel	N/A	PHMSA-2011-0023-0284	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0284
CenterPoint Energy - Comments	PUBLIC SUBMISSIONS	1	Bullock	Christopher	CenterPoint Energy	PHMSA-2011-0023-0076	Comment(s)	pdf	1	https://www.regulations.gov/document?D=PHMSA-2011-0023-0076
CenterPoint Energy, Inc. - Comments	PUBLIC SUBMISSIONS	1	Dolezel	Charles	CenterPoint Energy, Inc.	PHMSA-2011-0023-0077	Comment(s)	pdf	1	https://www.regulations.gov/document?D=PHMSA-2011-0023-0077
Comment from Ben Croftchik	PUBLIC SUBMISSIONS	N/A	Croftchik	Ben	N/A	PHMSA-2011-0023-0310	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0310
Comment from Paul Colbert	PUBLIC SUBMISSIONS	1	Colbert	Paul	Central Hudson Gas & Electric Corporation	PHMSA-2011-0023-0304	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0304
Comment from Daniel Hamburger	PUBLIC SUBMISSIONS	1	Hamburger	Daniel	Cheniere Energy, Inc.	PHMSA-2011-0023-0305	Comment(s)	pdf	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0305
Chevron - Comments	PUBLIC SUBMISSIONS	1	Christy	Roger	Chevron	PHMSA-2011-0023-0081	Comment(s)	N/A	1	https://www.regulations.gov/document?D=PHMSA-2011-0023-0081
Comment from Dr. Linda K. Phillips	PUBLIC SUBMISSIONS	1	Phillips	Dr. Linda K.	N/A	PHMSA-2011-0023-0384	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0384
Stephan Pott - Comments	PUBLIC SUBMISSIONS	1	Pott	Steve	N/A	PHMSA-2011-0023-0155	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0155
Comment from Roger Smith	PUBLIC SUBMISSIONS	N/A	Smith	Roger	N/A	PHMSA-2011-0023-0205	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0205
City and County of San Francisco - Comments	PUBLIC SUBMISSIONS	1	Yang	Austin	City and County of San Francisco	PHMSA-2011-0023-0084	Comment(s)	N/A	1	https://www.regulations.gov/document?D=PHMSA-2011-0023-0084
Comment from DAVID MUCKLOW	PUBLIC SUBMISSIONS	3	MUCKLOW	DAVID	COALITION TO REROUTE	PHMSA-2011-0023-0230	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0230
Comment from Caleb Laieski	PUBLIC SUBMISSIONS	N/A	Laieski	Caleb	N/A	PHMSA-2011-0023-0158	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0158
Comment from Daniel Nelson	PUBLIC SUBMISSIONS	N/A	Nelson	Daniel	N/A	PHMSA-2011-0023-0165	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0165
Comment from Matthew Hite	PUBLIC SUBMISSIONS	1	Hite	Matthew	N/A	PHMSA-2011-0023-0291	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0291
Delaware Solid Waste Authority - Comments	PUBLIC SUBMISSIONS	1	Marconi	Angela	Delaware Solid Waste Authority	PHMSA-2011-0023-0055	Comment(s)	pdf	1	https://www.regulations.gov/document?D=PHMSA-2011-0023-0055
Comment from Holly Pearen	PUBLIC SUBMISSIONS	2	Pearen	Holly	N/A	PHMSA-2011-0023-0351	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0351
Comment from Roger Kelley	PUBLIC SUBMISSIONS	1	Kelley	Roger	DEPA	PHMSA-2011-0023-0343	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0343
Comment from Ronna Lucas	PUBLIC SUBMISSIONS	N/A	Lucas	Ronna	N/A	PHMSA-2011-0023-0245	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0245
Comment from Craig Meis	PUBLIC SUBMISSIONS	1	Meis	Craig	N/A	PHMSA-2011-0023-0376	Comment(s)	pdf	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0376
Dominion East Ohio Gas - Comments	PUBLIC SUBMISSIONS	1	Hall	Eric	Dominion East Ohio Gas	PHMSA-2011-0023-0064	Comment(s)	N/A	1	https://www.regulations.gov/document?D=PHMSA-2011-0023-0064
El Paso - Comments	PUBLIC SUBMISSIONS	1	Carey	Patrick	El Paso	PHMSA-2011-0023-0074	Comment(s)	pdf	1	https://www.regulations.gov/document?D=PHMSA-2011-0023-0074
Comment from Tim Moore	PUBLIC SUBMISSIONS	1	Moore	Tim	Enable Midstream Partners	PHMSA-2011-0023-0357	Comment(s)	pdf	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0357
Comment from Bob Buchanan	PUBLIC SUBMISSIONS	1	Buchanan	Bob	N/A	PHMSA-2011-0023-0221	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0221
Comment from Daniel Garcia	PUBLIC SUBMISSIONS	N/A	Garcia	Daniel	N/A	PHMSA-2011-0023-0266	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0266
GPA Midstream Association	PUBLIC SUBMISSIONS	1	Hite	Matthew	N/A	PHMSA-2011-0023-0156	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0156
Comment from Adam Christopher	PUBLIC SUBMISSIONS	1	Christopher	Adam	N/A	PHMSA-2011-0023-0333	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0333
Comment from Leatra Harper	PUBLIC SUBMISSIONS	1	Harper	Leatra	N/A	PHMSA-2011-0023-0246	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0246
Rice Energy Inc. - Comments	PUBLIC SUBMISSIONS	1	Benson	Glenn	N/A	PHMSA-2011-0023-0437	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0437
Bryan Long - Comment	PUBLIC SUBMISSIONS	N/A	Long	Bryan	N/A	PHMSA-2011-0023-0116	Comment(s)	N/A	1	https://www.regulations.gov/document?D=PHMSA-2011-0023-0116
Comment from Agata Surowiec	PUBLIC SUBMISSIONS	N/A	Surowiec	Agata	N/A	PHMSA-2011-0023-0431	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0431
Comment from David Johnson	PUBLIC SUBMISSIONS	1	Johnson	David	Energy Transfer Partners	PHMSA-2011-0023-0294	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0294
Comment from Jim O'Brien	PUBLIC SUBMISSIONS	N/A	O'Brien	Jim	N/A	PHMSA-2011-0023-0262	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0262
Comment from Jeff Morton	PUBLIC SUBMISSIONS	1	Morton	Jeff	Enterprise Products	PHMSA-2011-0023-0353	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0353
Environmental Defense Fund - Comments	PUBLIC SUBMISSIONS	1	Alvarez	Ramon	Environmental Defense Fund	PHMSA-2011-0023-0091	Comment(s)	N/A	1	https://www.regulations.gov/document?D=PHMSA-2011-0023-0091
Comment from Keith Coyle	PUBLIC SUBMISSIONS	1	Coyle	Keith	EQT Corporation	PHMSA-2011-0023-0336	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0336
Comment from Evelyn Wagner	PUBLIC SUBMISSIONS	N/A	Wagner	Evelyn	N/A	PHMSA-2011-0023-0397	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0397
Comment from Heather Townsend	PUBLIC SUBMISSIONS	N/A	Townsend	Heather	N/A	PHMSA-2011-0023-0217	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0217
Ann Pinca - Comment	PUBLIC SUBMISSIONS	1	Pinca	Ann	N/A	PHMSA-2011-0023-0037	Comment(s)	N/A	1	https://www.regulations.gov/document?D=PHMSA-2011-0023-0037
Comment from Lauren Toczylowski	PUBLIC SUBMISSIONS	1	Toczylowski	Lauren	N/A	PHMSA-2011-0023-0278	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0278
Comment from Terry Boss	PUBLIC SUBMISSIONS	9	Boss	Terry	N/A	PHMSA-2011-0023-0383	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0383
Federal Energy Regulatory Commission - Comment	PUBLIC SUBMISSIONS	1	Zarraby	Cyrus	Federal Energy Regulatory Commission, Office of Energy Projects	PHMSA-2011-0023-0027	Comment(s)	pdf	1	https://www.regulations.gov/document?D=PHMSA-2011-0023-0027
Comment from DeWitt Burdeaux	PUBLIC SUBMISSIONS	1	Burdeaux	DeWitt	FlexSteel Pipeline	PHMSA-2011-0023-0271	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0271
Pipeline Safety: Gas Transmission Pipelines	PROPOSED RULES	N/A	N/A	N/A	N/A	PHMSA-2011-0023-0001	Advance Notice of	html	17	https://www.regulations.gov/document?D=PHMSA-2011-0023-0001
Comment from Joe Karney	PUBLIC SUBMISSIONS	1	Karney	Joe	N/A	PHMSA-2011-0023-0323	Comment(s)	pdf	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0323
Comment from Sarah Killeen	PUBLIC SUBMISSIONS	1	Killeen	Sarah	N/A	PHMSA-2011-0023-0220	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0220

Comment from David McGuire	PUBLIC SUBMISSIONS		1	McGuire	David	N/A	PHMSA-2011-0023-0332	Comment(s)	pdf	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0332
Comment from Catherine Fowler	PUBLIC SUBMISSIONS	N/A		Fowler	Catherine	N/A	PHMSA-2011-0023-0187	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0187
Comment from Kyle Rohrig	PUBLIC SUBMISSIONS	N/A		Rohrig	Kyle	N/A	PHMSA-2011-0023-0223	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0223
Comment from Drew Martin	PUBLIC SUBMISSIONS		1	Martin	Drew	N/A	PHMSA-2011-0023-0282	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0282
Comment from Denise Furey	PUBLIC SUBMISSIONS	N/A		Furey	Denise	N/A	PHMSA-2011-0023-0277	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0277
Comment from James Melia	PUBLIC SUBMISSIONS		1	Melia	James	N/A	PHMSA-2011-0023-0210	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0210
William F. Wissemann - Comments	PUBLIC SUBMISSIONS		1	Wissemann	William	N/A	PHMSA-2011-0023-0011	Comment(s)	N/A	4	https://www.regulations.gov/document?D=PHMSA-2011-0023-0011
Comment from Janet Graber	PUBLIC SUBMISSIONS	N/A		Graber	Janet	N/A	PHMSA-2011-0023-0392	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0392
Comment from Doug McLinko	PUBLIC SUBMISSIONS	N/A		McLinko	Doug	N/A	PHMSA-2011-0023-0209	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0209
Comment from Anne Germain	PUBLIC SUBMISSIONS		1	Germain	Anne	N/A	PHMSA-2011-0023-0143	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0143
Comment from Mike Kirkwood	PUBLIC SUBMISSIONS		1	Kirkwood	Mike	N/A	PHMSA-2011-0023-0252	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0252
Comment from Helena Rhim	PUBLIC SUBMISSIONS		1	Rhim	Helena	N/A	PHMSA-2011-0023-0319	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0319
Gas Piping Technology Committee - Comment	PUBLIC SUBMISSIONS		1	Cabot	Paul	Gas Piping Technology Committee	PHMSA-2011-0023-0111	Comment(s)	N/A	1	https://www.regulations.gov/document?D=PHMSA-2011-0023-0111
Comment from E Kamine	PUBLIC SUBMISSIONS	N/A		Kamine	E	N/A	PHMSA-2011-0023-0393	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0393
Comment from Michael Bellman	PUBLIC SUBMISSIONS		1	Bellman	Michael	Gas Piping Technology Committee (GPTC)	PHMSA-2011-0023-0303	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0303
Comment from Richard Lonn	PUBLIC SUBMISSIONS		1	Lonn	Richard	N/A	PHMSA-2011-0023-0345	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0345
Gas Processors Association - Comments	PUBLIC SUBMISSIONS		1	Applekamp	Jeff	Gas Processors Association	PHMSA-2011-0023-0080	Comment(s)	N/A	1	https://www.regulations.gov/document?D=PHMSA-2011-0023-0080
Comment from GE Oil & Gas	PUBLIC SUBMISSIONS		1	Hedren	Patrick	General Electric	PHMSA-2011-0023-0151	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0151
Harris County Fire Marshal's Office - Comment	PUBLIC SUBMISSIONS	N/A		Royall, Jr.	Robert	Harris County Fire Marshal's Office	PHMSA-2011-0023-0010	Comment(s)	N/A	1	https://www.regulations.gov/document?D=PHMSA-2011-0023-0010
Comment from Allen Drown	PUBLIC SUBMISSIONS	N/A		Drown	Allen	N/A	PHMSA-2011-0023-0401	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0401
Comment from American Homeowner	PUBLIC SUBMISSIONS	N/A		Homeowner	American	N/A	PHMSA-2011-0023-0180	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0180
Comment from Rick Kivela	PUBLIC SUBMISSIONS		1	Kivela	Rick	N/A	PHMSA-2011-0023-0378	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0378
Comment from Taylor Airey	PUBLIC SUBMISSIONS		1	Airey	Taylor	Independent Petroleum Association of America, et al.	PHMSA-2011-0023-0306	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0306
Comment from Beth Roads	PUBLIC SUBMISSIONS		1	Roads	Beth	Indiana Utility Regulatory Commission	PHMSA-2011-0023-0295	Comment(s)	pdf	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0295
Comment from Ed Kacer	PUBLIC SUBMISSIONS		1	Kacer	Ed	N/A	PHMSA-2011-0023-0366	Comment(s)	pdf	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0366
Comment from Paul Cicio	PUBLIC SUBMISSIONS		1	Cicio	Paul	Industrial Energy Consumers of America	PHMSA-2011-0023-0224	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0224
Comment from Farris Berry	PUBLIC SUBMISSIONS		1	Berry	Farris	N/A	PHMSA-2011-0023-0309	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0309
Comment from Tyler Gray	PUBLIC SUBMISSIONS		1	Gray	Tyler	N/A	PHMSA-2011-0023-0416	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0416
Comment from Paul Cicio	PUBLIC SUBMISSIONS		1	Cicio	Paul	Industrial Energy Consumers of America	PHMSA-2011-0023-0258	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0258
The Interstate Natural Gas Association of America (INGAA) - Report - Analysis of Natural Gas Transmission Pipeline Releases and Mitigation Options for Pipeline MAOP Reconfirmation	OTHER		1	Osman	C.J.	INGAA	PHMSA-2011-0023-0440	Assessment Docu	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0440
Pipeline Safety: Safety of Gas Transmission and Gathering Pipelines	PROPOSED RULES	N/A		N/A	N/A	N/A	PHMSA-2011-0023-0118	Notice of Propose	html	136	https://www.regulations.gov/document?D=PHMSA-2011-0023-0118
Interstate Natural Gas Association of America - Comment	PUBLIC SUBMISSIONS		2	Boss	Terry	INGAA	PHMSA-2011-0023-0006	N/A	N/A	0	https://www.regulations.gov/document?D=PHMSA-2011-0023-0006
Comment from New Jersey Natural Gas NJR	PUBLIC SUBMISSIONS		1	NJR	New Jersey Natura	N/A	PHMSA-2011-0023-0280	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0280
The Interstate Natural Gas Association of America and the American Gas Association - Request	SUPPORTING & RELATE		1	Christina Sames	Terry Boss (INGAA	INGAA and AGA	PHMSA-2011-0023-0002	Supplement	N/A	1	https://www.regulations.gov/document?D=PHMSA-2011-0023-0002
INGAA ANPRM Safety of Gas Transmission Pipelines Webinar	SUPPORTING & RELATE		1	N/A	N/A	INGAA ANPRM Safety of Gas Transmission Pipelines	PHMSA-2011-0023-0113	Supplement	N/A	1	https://www.regulations.gov/document?D=PHMSA-2011-0023-0113
Comment from Jason Schwartz	PUBLIC SUBMISSIONS		1	Schwartz	Jason	Institute for Policy Integrity at NYU School of Law	PHMSA-2011-0023-0354	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0354
Comment from Glen Fridenstine	PUBLIC SUBMISSIONS	N/A		Fridenstine	Glen	N/A	PHMSA-2011-0023-0194	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0194
Interstate Natural Gas Association of America's & American Gas Association's	SUPPORTING & RELATE		1	Boss	Terry	Interstate Natural Gas Association of America	PHMSA-2011-0023-0004	Supplement	N/A	1	https://www.regulations.gov/document?D=PHMSA-2011-0023-0004
Comment from Nick Lauren	PUBLIC SUBMISSIONS	N/A		Lauren	Nick	N/A	PHMSA-2011-0023-0183	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0183
Bob Beaumier - Comment	PUBLIC SUBMISSIONS		1	Beaumier	Bob	N/A	PHMSA-2011-0023-0110	Comment(s)	N/A	1	https://www.regulations.gov/document?D=PHMSA-2011-0023-0110
Comment from Grace dela Rosa	PUBLIC SUBMISSIONS		1	dela Rosa	Grace	N/A	PHMSA-2011-0023-0382	Comment(s)	pdf	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0382
Interstate Oil and Gas Compact Commission - Comment	PUBLIC SUBMISSIONS		1	Smith	Carl	N/A	PHMSA-2011-0023-0023	Comment(s)	N/A	1	https://www.regulations.gov/document?D=PHMSA-2011-0023-0023

Interstate Natural Gas Association of America - Comments	PUBLIC SUBMISSIONS	3	Regan	Dan	Interstate Natural Gas Association of America	PHMSA-2011-0023-0082	Comment(s)	N/A	1	https://www.regulations.gov/document?D=PHMSA-2011-0023-0082
Comment from David Werner	PUBLIC SUBMISSIONS	N/A	Werner	David	N/A	PHMSA-2011-0023-0186	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0186
National Grid's - Comment	PUBLIC SUBMISSIONS	1	Shapiro	Arthur	N/A	PHMSA-2011-0023-0028	Comment(s)	N/A	1	https://www.regulations.gov/document?D=PHMSA-2011-0023-0028
Comment from Talmadge Centers	PUBLIC SUBMISSIONS	1	Centers	Talmadge	N/A	PHMSA-2011-0023-0346	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0346
Iowa Association of Municipal Utilities - Comments	PUBLIC SUBMISSIONS	1	Hraha	David	Iowa Association of Municipal Utilities	PHMSA-2011-0023-0049	Comment(s)	N/A	1	https://www.regulations.gov/document?D=PHMSA-2011-0023-0049
Comment from Ethan Boger	PUBLIC SUBMISSIONS	N/A	Boger	Ethan	N/A	PHMSA-2011-0023-0273	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0273
Comment from Anonymous Anonymous	PUBLIC SUBMISSIONS	1	Anonymous	Anonymous	Anonymous	PHMSA-2011-0023-0418	Comment(s)	pdf	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0418
Joseph J.H. Humphrey - Comments	PUBLIC SUBMISSIONS	N/A	Humphrey	Joseph	Joseph Humphrey &	PHMSA-2011-0023-0070	Comment(s)	N/A	1	https://www.regulations.gov/document?D=PHMSA-2011-0023-0070
Comment from Kathryn Aldrich	PUBLIC SUBMISSIONS	N/A	Aldrich	Kathryn	N/A	PHMSA-2011-0023-0227	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0227
Comment from Donald Houston	PUBLIC SUBMISSIONS	N/A	Houston	Donald	N/A	PHMSA-2011-0023-0239	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0239
Comment from Cherie Baker	PUBLIC SUBMISSIONS	N/A	Baker	Cherie	N/A	PHMSA-2011-0023-0174	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0174
Richard A. Ide - Comment	PUBLIC SUBMISSIONS	1	Ide	Richard	N/A	PHMSA-2011-0023-0112	Comment(s)	N/A	1	https://www.regulations.gov/document?D=PHMSA-2011-0023-0112
Comment from Michael Falk	PUBLIC SUBMISSIONS	2	Falk	Michael	N/A	PHMSA-2011-0023-0387	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0387
Eric McCabe - Comment	PUBLIC SUBMISSIONS	N/A	McCabe	Eric	N/A	PHMSA-2011-0023-0036	Comment(s)	N/A	1	https://www.regulations.gov/document?D=PHMSA-2011-0023-0036
Comment from Gregory George	PUBLIC SUBMISSIONS	1	George	Gregory	N/A	PHMSA-2011-0023-0321	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0321
Comment from Chuck Harris	PUBLIC SUBMISSIONS	1	Harris	Chuck	N/A	PHMSA-2011-0023-0253	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0253
Comment from Frank Bennett	PUBLIC SUBMISSIONS	1	Bennett	Frank	N/A	PHMSA-2011-0023-0334	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0334
Comment from Jeff Millington	PUBLIC SUBMISSIONS	1	Millington	Jeff	N/A	PHMSA-2011-0023-0338	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0338
Kern River Gas Transmission Company - Comments	PUBLIC SUBMISSIONS	1	Checketts	Robert	Kern River Gas Transmission Company	PHMSA-2011-0023-0089	Comment(s)	N/A	1	https://www.regulations.gov/document?D=PHMSA-2011-0023-0089
Comment from Gary Buchler	PUBLIC SUBMISSIONS	1	Buchler	Gary	Kinder Morgan, Inc.	PHMSA-2011-0023-0349	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0349
Comment from Jeffrey L. Maples	PUBLIC SUBMISSIONS	1	Maples	Jeffrey L.	N/A	PHMSA-2011-0023-0360	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0360
Southwest Gas Corporation - Request for Extension of Comment Period	OTHER	1	Schmitz	Jerome T.	N/A	PHMSA-2011-0023-0128	Request	N/A	1	https://www.regulations.gov/document?D=PHMSA-2011-0023-0128
League of Women Voters of PA - Comments	PUBLIC SUBMISSIONS	1	Thorne	Olivia	League of Women Voters of PA	PHMSA-2011-0023-0062	Comment(s)	N/A	1	https://www.regulations.gov/document?D=PHMSA-2011-0023-0062
Comment from Peter Clyde	PUBLIC SUBMISSIONS	1	Clyde	Peter	Louisville Gas & Electric	PHMSA-2011-0023-0308	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0308
Comment from Simon Normand	PUBLIC SUBMISSIONS	1	Normand	Simon	Massachusetts Materials Technologies, LLC	PHMSA-2011-0023-0371	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0371
MidAmerican Energy Company - Comments	PUBLIC SUBMISSIONS	1	Jared	Robert	MidAmerican Energy Company	PHMSA-2011-0023-0095	Comment(s)	N/A	1	https://www.regulations.gov/document?D=PHMSA-2011-0023-0095
Comment from Frank Allison	PUBLIC SUBMISSIONS	N/A	Allison	Frank	N/A	PHMSA-2011-0023-0225	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0225
Comment from Heather Shelby	PUBLIC SUBMISSIONS	1	Shelby	Heather	N/A	PHMSA-2011-0023-0329	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0329
Pipeline Safety: Safety of Gas Transmission and Gathering Pipelines	PROPOSED RULES	N/A	N/A	N/A	N/A	PHMSA-2011-0023-0136	Notice of Proposed Rulemaking	html	2	https://www.regulations.gov/document?D=PHMSA-2011-0023-0136
Comment from Ezra Goldschmiedt	PUBLIC SUBMISSIONS	N/A	Goldschmiedt	Ezra	N/A	PHMSA-2011-0023-0197	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0197
Comment from MidAmerican Energy Company	PUBLIC SUBMISSIONS	1	Sullivan	Connie	MidAmerican Energy Company	PHMSA-2011-0023-0178	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0178
Elaine Lapp Esch - Comments	PUBLIC SUBMISSIONS	N/A	Esch	Elaine	N/A	PHMSA-2011-0023-0072	Comment(s)	N/A	1	https://www.regulations.gov/document?D=PHMSA-2011-0023-0072
AGA, INGAA, API, IPAA, GPA, and APGA- Request for Extension of Comment Period	OTHER	1	N/A	N/A	N/A	PHMSA-2011-0023-0134	Acknowledgement	N/A	3	https://www.regulations.gov/document?D=PHMSA-2011-0023-0134
Comment from Josephine Ferro	PUBLIC SUBMISSIONS	N/A	Ferro	Josephine	N/A	PHMSA-2011-0023-0211	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0211
Comment from Josh Sanders	PUBLIC SUBMISSIONS	1	Sanders	Josh	Montana-Dakota Utilities Co. & Great Plains Natural Gas	PHMSA-2011-0023-0216	Comment(s)	pdf	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0216
Comment from Amy Rosmarin	PUBLIC SUBMISSIONS	N/A	Rosmarin	Amy	N/A	PHMSA-2011-0023-0348	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0348
Comment from Pat Thon	PUBLIC SUBMISSIONS	N/A	Thon	Pat	N/A	PHMSA-2011-0023-0330	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0330
Comment from Richard Kuprewicz	PUBLIC SUBMISSIONS	1	Kuprewicz	Richard	N/A	PHMSA-2011-0023-0300	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0300
NACE International - Comment	PUBLIC SUBMISSIONS	1	Moghissi, PhD.	Oliver	NACE International	PHMSA-2011-0023-0024	Comment(s)	N/A	1	https://www.regulations.gov/document?D=PHMSA-2011-0023-0024
CONSOL Energy Inc. Letter - Extension Request U.S DOT PipelineSafety 04192016	OTHER	1	Anonymous	Anonymous	N/A	PHMSA-2011-0023-0122	Letter(s)	N/A	1	https://www.regulations.gov/document?D=PHMSA-2011-0023-0122
Comment from Debby Christy	PUBLIC SUBMISSIONS	1	Christy	Debby	N/A	PHMSA-2011-0023-0256	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0256
Comment from Chevron Corporation	PUBLIC SUBMISSIONS	1	Corporation	Chevron	N/A	PHMSA-2011-0023-0264	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0264
Comment from Vern Meier (TransCanada)	PUBLIC SUBMISSIONS	1	Meier (TransCanada)	Vern	N/A	PHMSA-2011-0023-0379	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0379
Comment from Ethan Boger	PUBLIC SUBMISSIONS	N/A	Boger	Ethan	N/A	PHMSA-2011-0023-0268	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0268
National Association of Pipeline Safety Representatives - Comments	PUBLIC SUBMISSIONS	1	Metro	Paul	National Association of Pipeline Safety	PHMSA-2011-0023-0053	Comment(s)	N/A	1	https://www.regulations.gov/document?D=PHMSA-2011-0023-0053
Comment from Caleb Laieski	PUBLIC SUBMISSIONS	N/A	Laieski	Caleb	N/A	PHMSA-2011-0023-0159	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0159
Comment from Daniel Delmonico	PUBLIC SUBMISSIONS	1	Delmonico	Daniel	N/A	PHMSA-2011-0023-0285	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0285

Comment from Robert Gardner	PUBLIC SUBMISSIONS		1	Gardner	Robert	N/A	PHMSA-2011-0023-0367	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0367
Comment from Nancy Dollard	PUBLIC SUBMISSIONS	N/A		Dollard	Nancy	N/A	PHMSA-2011-0023-0168	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0168
The Iowa Utilities Board - Comment	PUBLIC SUBMISSIONS		1	Stursma	Donald	N/A	PHMSA-2011-0023-0022	Comment(s)	N/A		1 https://www.regulations.gov/document?D=PHMSA-2011-0023-0022
Comment from Anonymous	PUBLIC SUBMISSIONS	N/A		Anonymous	Anonymous	N/A	PHMSA-2011-0023-0200	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0200
Comment from David Steffen	PUBLIC SUBMISSIONS	N/A		Steffen	David	N/A	PHMSA-2011-0023-0207	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0207
National Association of Pipeline Safety Representatives Request for Extension- NAPS R 4-8-2016 Sub	OTHER		1	Clarillos	Robert	National Association of Pipeline Safety Representatives (NAPSR)	PHMSA-2011-0023-0119	Request	N/A		1 https://www.regulations.gov/document?D=PHMSA-2011-0023-0119
Anonymous	PUBLIC SUBMISSIONS	N/A		Anonymous	Anonymous	N/A	PHMSA-2011-0023-0176	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0176
NAPSR - 2016 GasTrans NPRM Extension Request Ltr NAPSR 6-21-2016 Submitted	OTHER		1	Clarillos	Robert	National Association of Pipeline Safety Representatives (NAPSR)	PHMSA-2011-0023-0166	Request	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0166
Comment from Diane Schmidt	PUBLIC SUBMISSIONS	N/A		Schmidt	Diane	N/A	PHMSA-2011-0023-0202	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0202
Comment from Cathy Loeb	PUBLIC SUBMISSIONS	N/A		Loeb	Cathy	N/A	PHMSA-2011-0023-0355	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0355
Ralph Kisberg - Comment	PUBLIC SUBMISSIONS		1	Kisberg	Ralph	N/A	PHMSA-2011-0023-0102	Comment(s)	N/A		1 https://www.regulations.gov/document?D=PHMSA-2011-0023-0102
Comment from Jerome T Schmitz	PUBLIC SUBMISSIONS		1	Schmitz	Jerome T	N/A	PHMSA-2011-0023-0356	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0356
Sheila E. Lunger - Comments	PUBLIC SUBMISSIONS	N/A		Lunger	Sheila	N/A	PHMSA-2011-0023-0050	Comment(s)	N/A		1 https://www.regulations.gov/document?D=PHMSA-2011-0023-0050
Comment from Robert Clarillos	PUBLIC SUBMISSIONS		1	Clarillos	Robert	National Association of Pipeline Safety	PHMSA-2011-0023-0370	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0370
Comment from James Bradford Ramsay	PUBLIC SUBMISSIONS		1	Ramsay	James Bradford	National Association of Regulatory Utility	PHMSA-2011-0023-0292	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0292
Comment from Paul Stehura	PUBLIC SUBMISSIONS	N/A		Stehura	Paul	N/A	PHMSA-2011-0023-0237	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0237
Comment from Richard Baumgartner	PUBLIC SUBMISSIONS	N/A		Baumgartner	Richard	N/A	PHMSA-2011-0023-0172	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0172
Comment from Melissa Marshall	PUBLIC SUBMISSIONS		1	Marshall	Melissa	N/A	PHMSA-2011-0023-0365	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0365
Comment from anonymous	PUBLIC SUBMISSIONS	N/A		Anomn	Anon	N/A	PHMSA-2011-0023-0137	Comment(s)	N/A		1 https://www.regulations.gov/document?D=PHMSA-2011-0023-0137
Bob Beaumier - Comments	PUBLIC SUBMISSIONS		1	Beaumier	Bob	N/A	PHMSA-2011-0023-0052	Comment(s)	pdf		1 https://www.regulations.gov/document?D=PHMSA-2011-0023-0052
Comment from Andrew Levron	PUBLIC SUBMISSIONS	N/A		Levron	Andrew	N/A	PHMSA-2011-0023-0144	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0144
NARUC Extension Request Letter 2016-4-14	PUBLIC SUBMISSIONS		1	Ramsay	James Bradford	National Association of Regulatory Utility	PHMSA-2011-0023-0120	Comment(s)	N/A		1 https://www.regulations.gov/document?D=PHMSA-2011-0023-0120
Comment from MA Rohrer	PUBLIC SUBMISSIONS	N/A		Rohrer	MA	N/A	PHMSA-2011-0023-0179	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0179
National Fuel Gas Supply Corporation - Comment	PUBLIC SUBMISSIONS		1	Bayer	Janet	National Fuel Gas Supply Corporation	PHMSA-2011-0023-0099	Comment(s)	N/A		1 https://www.regulations.gov/document?D=PHMSA-2011-0023-0099
National Grid - Request for 60 Day Extension of Comment Period	OTHER		1	N/A	N/A	National Grid	PHMSA-2011-0023-0130	Request	pdf		1 https://www.regulations.gov/document?D=PHMSA-2011-0023-0130
Comment from Stephanie Watson	PUBLIC SUBMISSIONS		1	Watson	Stephanie	N/A	PHMSA-2011-0023-0276	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0276
Comments regarding Safety of Gas Transmission NPRM	PUBLIC SUBMISSIONS		1	Sheppard	Brian	N/A	PHMSA-2011-0023-0430	Comment(s)	pdf	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0430
Comment from Beth Esser	PUBLIC SUBMISSIONS	N/A		Esser	Beth	N/A	PHMSA-2011-0023-0317	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0317
ITT Exelis Geospatial Systems - Comment	PUBLIC SUBMISSIONS		1	Sloniker	Rick	N/A	PHMSA-2011-0023-0013	Comment(s)	N/A		1 https://www.regulations.gov/document?D=PHMSA-2011-0023-0013
Arthur A. Spapiro - Comment	PUBLIC SUBMISSIONS	N/A		Shapiro	Arthur	National Grid	PHMSA-2011-0023-0104	Comment(s)	N/A		1 https://www.regulations.gov/document?D=PHMSA-2011-0023-0104
National Solid Waste Management Association - Comments	PUBLIC SUBMISSIONS		1	Repa	Edward	National Solid Waste Management Association	PHMSA-2011-0023-0090	Comment(s)	N/A		1 https://www.regulations.gov/document?D=PHMSA-2011-0023-0090
Comment from Paul Jackson	PUBLIC SUBMISSIONS		1	Jackson	Paul	N/A	PHMSA-2011-0023-0132	Comment(s)	N/A		1 https://www.regulations.gov/document?D=PHMSA-2011-0023-0132
Comment from Allen Schuele	PUBLIC SUBMISSIONS	N/A		Schuele	Allen	N/A	PHMSA-2011-0023-0126	Comment(s)	N/A		1 https://www.regulations.gov/document?D=PHMSA-2011-0023-0126
Comment from Laurel Gress	PUBLIC SUBMISSIONS	N/A		Gress	Laurel	N/A	PHMSA-2011-0023-0167	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0167
National Teransportation Safety Board - Comment	PUBLIC SUBMISSIONS		1	Hersman	Deborah	National Transportation Safety Board	PHMSA-2011-0023-0018	Comment(s)	pdf		1 https://www.regulations.gov/document?D=PHMSA-2011-0023-0018
Comment from Sandra Peters	PUBLIC SUBMISSIONS		1	Peters	Sandra	N/A	PHMSA-2011-0023-0398	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0398
National Utility Locating Contractors Association - Comments	PUBLIC SUBMISSIONS		1	Peterson	Ron	National Utility Locating Contractors Association	PHMSA-2011-0023-0051	Comment(s)	N/A		1 https://www.regulations.gov/document?D=PHMSA-2011-0023-0051
Comment from Robert Gordon	PUBLIC SUBMISSIONS	N/A		Gordon	Robert	N/A	PHMSA-2011-0023-0142	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0142
Comment from Colleen Orsburn	PUBLIC SUBMISSIONS	N/A		Orsburn	Colleen	N/A	PHMSA-2011-0023-0364	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0364
Nicor Gas - Comments	PUBLIC SUBMISSIONS		1	Quezada	Leticia	Nicor Gas	PHMSA-2011-0023-0078	Comment(s)	N/A		1 https://www.regulations.gov/document?D=PHMSA-2011-0023-0078
NiSource Gas Transmission & Storage - Comments	PUBLIC SUBMISSIONS		1	George	Fredric	NiSource Gas Transmission & Storage	PHMSA-2011-0023-0083	Comment(s)	N/A		1 https://www.regulations.gov/document?D=PHMSA-2011-0023-0083
Comment from Kenneth Christman	PUBLIC SUBMISSIONS		1	Christman	Kenneth	NiSource Inc.	PHMSA-2011-0023-0255	Comment(s)	docx	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0255
Northern Natural Gas - Comments	PUBLIC SUBMISSIONS		1	Correll	Thomas	Northern Natural Gas	PHMSA-2011-0023-0059	Comment(s)	pdf		1 https://www.regulations.gov/document?D=PHMSA-2011-0023-0059
Comment from Washington Gas Light Company	PUBLIC SUBMISSIONS		1	Parker	Curtis	N/A	PHMSA-2011-0023-0428	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0428
Robert Cross - Comment	PUBLIC SUBMISSIONS		1	Cross	Robert	N/A	PHMSA-2011-0023-0101	Comment(s)	N/A		0 https://www.regulations.gov/document?D=PHMSA-2011-0023-0101
Comment from John and Kristin McDonough	PUBLIC SUBMISSIONS	N/A		McDonough	John and Kristin	N/A	PHMSA-2011-0023-0196	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0196
Comment from Marilyn Learner	PUBLIC SUBMISSIONS	N/A		Learner	Marilyn	N/A	PHMSA-2011-0023-0229	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0229

Comment from Mark Evans	PUBLIC SUBMISSIONS	N/A	Evans	Mark	N/A	PHMSA-2011-0023-0127	Comment(s)	N/A	0	https://www.regulations.gov/document?D=PHMSA-2011-0023-0127
Comment from Marc Mullooney	PUBLIC SUBMISSIONS	1	Mullooney	Marc	NorthWestern Corporation	PHMSA-2011-0023-0228	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0228
Comment from Thomas Dorr	PUBLIC SUBMISSIONS	N/A	Dorr	Thomas	N/A	PHMSA-2011-0023-0324	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0324
Comment from Tyler Gray	PUBLIC SUBMISSIONS	1	Gray	Tyler	N/A	PHMSA-2011-0023-0417	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0417
Andrew Howard Shelofsky - Comments	PUBLIC SUBMISSIONS	1	Shelofsky	Andrew	N/A	PHMSA-2011-0023-0060	Comment(s)	N/A	1	https://www.regulations.gov/document?D=PHMSA-2011-0023-0060
Comment from Bobby Geer	PUBLIC SUBMISSIONS	N/A	Geer	Bobby	N/A	PHMSA-2011-0023-0195	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0195
Comment from SK AMERICAN CITIZEN	PUBLIC SUBMISSIONS	N/A	AMERICAN CITI	SK	N/A	PHMSA-2011-0023-0157	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0157
Norton McMurray Manufacturing Co. - Comments	PUBLIC SUBMISSIONS	1	Greene	Joel	Norton McMurray Manufacturing Company	PHMSA-2011-0023-0420	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0420
Comment from Janet Bayer	PUBLIC SUBMISSIONS	1	Bayer	Janet	N/A	PHMSA-2011-0023-0311	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0311
Paiute Pipeline Company - Request for 60 Day Extension of Comment Period	OTHER	1	Maples	Jeff	N/A	PHMSA-2011-0023-0131	Request	pdf	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0131
Comment from Thomas Bubenik	PUBLIC SUBMISSIONS	1	Bubenik	Thomas	N/A	PHMSA-2011-0023-0288	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0288
Comment from Brian Sheppard	PUBLIC SUBMISSIONS	1	Sheppard	Brian	N/A	PHMSA-2011-0023-0218	Comment(s)	pdf	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0218
Supplemental Comments of Norton McMurray Manufacturing Co.	PUBLIC SUBMISSIONS	1	Greene	Joel	Norton McMurray Manufacturing Company	PHMSA-2011-0023-0427	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0427
Comment from Nancy Harkins	PUBLIC SUBMISSIONS	N/A	Harkins	Nancy	N/A	PHMSA-2011-0023-0226	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0226
Comment from Thomas Kiley	PUBLIC SUBMISSIONS	1	Kiley	Thomas	N/A	PHMSA-2011-0023-0386	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0386
Comment from Donald Santa	PUBLIC SUBMISSIONS	2	Santa	Donald	N/A	PHMSA-2011-0023-0407	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0407
Comment from National Transportation Safety Board	PUBLIC SUBMISSIONS	1	Hart	Christopher	NTSB	PHMSA-2011-0023-0148	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0148
Comment from ruth west	PUBLIC SUBMISSIONS	N/A	west	ruth	N/A	PHMSA-2011-0023-0391	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0391
Oklahoma Independent Petroleum Association - Comments	PUBLIC SUBMISSIONS	1	Burckhalter	Angie	Oklahoma Independent Petroleum Association	PHMSA-2011-0023-0065	Comment(s)	N/A	1	https://www.regulations.gov/document?D=PHMSA-2011-0023-0065
Nancy Liebert - Comment	PUBLIC SUBMISSIONS	N/A	Liebert	Nancy	N/A	PHMSA-2011-0023-0035	Comment(s)	N/A	1	https://www.regulations.gov/document?D=PHMSA-2011-0023-0035
Comment from Jean Rouviere	PUBLIC SUBMISSIONS	N/A	Rouviere	Jean	N/A	PHMSA-2011-0023-0251	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0251
Comment from Loren Anderson	PUBLIC SUBMISSIONS	1	Anderson	Loren	N/A	PHMSA-2011-0023-0297	Comment(s)	pdf	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0297
Comment from Rita Strickler	PUBLIC SUBMISSIONS	N/A	Strickler	Rita	N/A	PHMSA-2011-0023-0181	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0181
North Bay Energy LLC - Comments	PUBLIC SUBMISSIONS	1	Shumway	Thad	N/A	PHMSA-2011-0023-0435	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0435
Comment from Ann Chisko	PUBLIC SUBMISSIONS	N/A	Chisko	Ann	N/A	PHMSA-2011-0023-0213	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0213
Oleksa and Associates, Inc. - Comments	PUBLIC SUBMISSIONS	1	Oleksa	Paul	Oleksa and Associates, Inc.	PHMSA-2011-0023-0069	Comment(s)	N/A	1	https://www.regulations.gov/document?D=PHMSA-2011-0023-0069
Comment from Richard Baumgartner	PUBLIC SUBMISSIONS	N/A	Baumgartner	Richard	N/A	PHMSA-2011-0023-0238	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0238
Comment from Sean O'Brien	PUBLIC SUBMISSIONS	N/A	O'Brien	Sean	N/A	PHMSA-2011-0023-0150	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0150
Comment from Anonymous	PUBLIC SUBMISSIONS	N/A	Anonymous	Anonymous	N/A	PHMSA-2011-0023-0139	Comment(s)	N/A	1	https://www.regulations.gov/document?D=PHMSA-2011-0023-0139
Paiute Pipeline Company - Comments	PUBLIC SUBMISSIONS	2	Moscoso	Rose	Paiute Pipeline Company	PHMSA-2011-0023-0067	Comment(s)	pdf	1	https://www.regulations.gov/document?D=PHMSA-2011-0023-0067
Comment from Erin Hutson	PUBLIC SUBMISSIONS	1	Hutson	Erin	N/A	PHMSA-2011-0023-0182	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0182
Comment from Judy Skog	PUBLIC SUBMISSIONS	N/A	Skog	Judy	N/A	PHMSA-2011-0023-0372	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0372
Comment from Dawn Kelliher Guthrie	PUBLIC SUBMISSIONS	1	Kelliher Guthrie	Dawn	N/A	PHMSA-2011-0023-0267	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0267
Texas Pipeline Association - Request for Extension	SUPPORTING & RELATE	1	N/A	N/A	N/A	PHMSA-2011-0023-0003	Supplement	xml	1	https://www.regulations.gov/document?D=PHMSA-2011-0023-0003
Comment from Robert Wilds	PUBLIC SUBMISSIONS	N/A	Wilds	Robert	N/A	PHMSA-2011-0023-0231	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0231
Comment from Karen Fridenstine	PUBLIC SUBMISSIONS	N/A	Fridenstine	Karen	N/A	PHMSA-2011-0023-0193	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0193
Panhandle Energy - Comments	PUBLIC SUBMISSIONS	1	Johnson	David	Panhandle Energy	PHMSA-2011-0023-0092	Comment(s)	N/A	1	https://www.regulations.gov/document?D=PHMSA-2011-0023-0092
Comment from MEERA AHAMED	PUBLIC SUBMISSIONS	1	AHAMED	MEERA	N/A	PHMSA-2011-0023-0337	Comment(s)	pdf	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0337
Comment from Michael Swerling	PUBLIC SUBMISSIONS	1	Swerling	Michael	PECO Energy Company	PHMSA-2011-0023-0400	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0400
Comment from Michael Swerling	PUBLIC SUBMISSIONS	1	Swerling	Michael	PECO Energy Company	PHMSA-2011-0023-0399	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0399
Hetty Baiz - Comment	PUBLIC SUBMISSIONS	N/A	Baiz	Hetty	N/A	PHMSA-2011-0023-0034	Comment(s)	N/A	1	https://www.regulations.gov/document?D=PHMSA-2011-0023-0034
Pennsylvania Public Utility Commission - Request for Extension of Comment Period	OTHER	1	N/A	N/A	Pennsylvania Public Utility Commission	PHMSA-2011-0023-0129	Request	pdf	1	https://www.regulations.gov/document?D=PHMSA-2011-0023-0129
Comment from Jeff Hansen	PUBLIC SUBMISSIONS	1	Hansen	Jeff	N/A	PHMSA-2011-0023-0363	Comment(s)	pdf	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0363
Comment from Greg Pace	PUBLIC SUBMISSIONS	N/A	Pace	Greg	N/A	PHMSA-2011-0023-0189	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0189
John A. Silla - Comment	PUBLIC SUBMISSIONS	N/A	Silla	John	N/A	PHMSA-2011-0023-0031	Comment(s)	N/A	1	https://www.regulations.gov/document?D=PHMSA-2011-0023-0031
Supporting Document for Gas Transmission for NPRM	SUPPORTING & RELATE	8	N/A	N/A	N/A	PHMSA-2011-0023-0117	Supplement	pdf	182	https://www.regulations.gov/document?D=PHMSA-2011-0023-0117
Comment from Myron Gerson	PUBLIC SUBMISSIONS	N/A	Gerson	Myron	N/A	PHMSA-2011-0023-0341	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0341
Corning - Comments	PUBLIC SUBMISSIONS	1	Fendley	Stanley	N/A	PHMSA-2011-0023-0154	Comment(s)	pdf	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0154
New York State of Opportunity Department of Public Service - Extension of Time Request	OTHER	1	N/A	N/A	N/A	PHMSA-2011-0023-0133	Acknowledgement	N/A	1	https://www.regulations.gov/document?D=PHMSA-2011-0023-0133
Comment from Dwain Provins	PUBLIC SUBMISSIONS	1	Provins	Dwain	N/A	PHMSA-2011-0023-0328	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0328

Comment from mary elliott	PUBLIC SUBMISSIONS	N/A	elliott	mary	N/A	PHMSA-2011-0023-0316	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0316
Comment from Cascade Natural Gas	PUBLIC SUBMISSIONS	1	Eutsey	Mike	N/A	PHMSA-2011-0023-0169	Comment(s)	pdf	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0169
NY Department of Public Service - Request for Extension of Comment Period	OTHER	1	Dean	Diane	N/A	PHMSA-2011-0023-0123	Request	N/A	1	https://www.regulations.gov/document?D=PHMSA-2011-0023-0123
Comment from Howard Ground	PUBLIC SUBMISSIONS	1	Ground	Howard	N/A	PHMSA-2011-0023-0318	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0318
Comment from Barbara Gottlieb	PUBLIC SUBMISSIONS	1	Gottlieb	Barbara	Physicians for Social	PHMSA-2011-0023-0352	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0352
Comment from Lucas Vebber	PUBLIC SUBMISSIONS	1	Vebber	Lucas	N/A	PHMSA-2011-0023-0232	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0232
Comment from Lynda Farrell	PUBLIC SUBMISSIONS	N/A	Farrell	Lynda	Pipeline Safety Coalition	PHMSA-2011-0023-0419	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0419
Comment from Darryl Gruen	PUBLIC SUBMISSIONS	1	Gruen	Darryl	N/A	PHMSA-2011-0023-0175	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0175
Comment from Lynda Farrell	PUBLIC SUBMISSIONS	1	Farrell	Lynda	Pipeline Safety Coalition	PHMSA-2011-0023-0410	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0410
Comment from Rebecca Craven	PUBLIC SUBMISSIONS	4	Craven	Rebecca	Pipeline Safety Trust	PHMSA-2011-0023-0272	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0272
Pipeline Safety Trust - Comment	PUBLIC SUBMISSIONS	1	Weimer	Carl	Pipeline Safety Trust	PHMSA-2011-0023-0044	Comment(s)	N/A	1	https://www.regulations.gov/document?D=PHMSA-2011-0023-0044
Comment from Nick M	PUBLIC SUBMISSIONS	N/A	M	Nick	N/A	PHMSA-2011-0023-0242	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0242
Tom Schwerdt - Comment	PUBLIC SUBMISSIONS	N/A	Schwerdt	Tom	Private individual	PHMSA-2011-0023-0019	Comment(s)	N/A	1	https://www.regulations.gov/document?D=PHMSA-2011-0023-0019
Comment from Eric Hall	PUBLIC SUBMISSIONS	1	Hall	Eric	N/A	PHMSA-2011-0023-0283	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0283
Comment from Anonymous Unknown	PUBLIC SUBMISSIONS	N/A	Unknown	Anonymous	N/A	PHMSA-2011-0023-0146	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0146
Comment from William Gilmore	PUBLIC SUBMISSIONS	1	Gilmore	William	N/A	PHMSA-2011-0023-0233	Comment(s)	pdf	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0233
Marilyn Stark - Comments	PUBLIC SUBMISSIONS	N/A	Stark	Marilyn	N/A	PHMSA-2011-0023-0056	Comment(s)	N/A	1	https://www.regulations.gov/document?D=PHMSA-2011-0023-0056
Comment from Bob Kenworthy	PUBLIC SUBMISSIONS	1	Kenworthy	Bob	N/A	PHMSA-2011-0023-0241	Comment(s)	docx	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0241
Comment from Aaron Mintzes	PUBLIC SUBMISSIONS	1	Mintzes	Aaron	N/A	PHMSA-2011-0023-0394	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0394
Comment from Terry Corman	PUBLIC SUBMISSIONS	N/A	Corman	Terry	N/A	PHMSA-2011-0023-0250	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0250
Mark S. Jordan -Comment	PUBLIC SUBMISSIONS	1	Jordan	Mark	N/A	PHMSA-2011-0023-0005	Comment(s)	pdf	2	https://www.regulations.gov/document?D=PHMSA-2011-0023-0005
Gregory Pais - Comment	PUBLIC SUBMISSIONS	N/A	Pais	Gregory	N/A	PHMSA-2011-0023-0030	Comment(s)	N/A	1	https://www.regulations.gov/document?D=PHMSA-2011-0023-0030
Professional Engineers in California Government (PECG) - Comment	PUBLIC SUBMISSIONS	1	Roberts	John	Professional Engineers in California Government	PHMSA-2011-0023-0025	Comment(s)	N/A	1	https://www.regulations.gov/document?D=PHMSA-2011-0023-0025
Comment from Andrew Levron	PUBLIC SUBMISSIONS	1	Levron	Andrew	N/A	PHMSA-2011-0023-0145	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0145
Comment from Michael Watz	PUBLIC SUBMISSIONS	1	Watz	Michael	PROTEC	PHMSA-2011-0023-0413	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0413
Comment from Phillip Murdock	PUBLIC SUBMISSIONS	1	Murdock	Phillip	N/A	PHMSA-2011-0023-0299	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0299
Comment from Caleb Laieski	PUBLIC SUBMISSIONS	N/A	Laieski	Caleb	N/A	PHMSA-2011-0023-0161	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0161
State of Washington, Citizens Advisory Committe on Pipeline Safety - Comment	PUBLIC SUBMISSIONS	1	Sweeney	Tim	N/A	PHMSA-2011-0023-0032	Comment(s)	pdf	1	https://www.regulations.gov/document?D=PHMSA-2011-0023-0032
Comment from Christopher Pioli	PUBLIC SUBMISSIONS	1	Pioli	Christopher	N/A	PHMSA-2011-0023-0374	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0374
Questar Gas Company - Comment	PUBLIC SUBMISSIONS	1	Brown	C. Scott	Questar Gas Company	PHMSA-2011-0023-0100	Comment(s)	pdf	1	https://www.regulations.gov/document?D=PHMSA-2011-0023-0100
Comment from Phyllis Hasbrouck	PUBLIC SUBMISSIONS	N/A	Hasbrouck	Phyllis	N/A	PHMSA-2011-0023-0249	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0249
Questar Pipeline Company - Comments	PUBLIC SUBMISSIONS	1	Bradley	R. Allan	Questar Pipeline Company	PHMSA-2011-0023-0079	Comment(s)	pdf	1	https://www.regulations.gov/document?D=PHMSA-2011-0023-0079
Comment from Ben Brower	PUBLIC SUBMISSIONS	1	Brower	Ben	N/A	PHMSA-2011-0023-0265	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0265
Comment from Elly Benson	PUBLIC SUBMISSIONS	2	Benson	Elly	Sierra Club	PHMSA-2011-0023-0375	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0375
Plastics Pipe Institute (PPI) Petition	OTHER	1	Knapp	Randall	N/A	PHMSA-2011-0023-0124	Petition(s)	N/A	2	https://www.regulations.gov/document?D=PHMSA-2011-0023-0124
Comment from Jimmie Cho	PUBLIC SUBMISSIONS	1	Cho	Jimmie	SoCalGas and SDG&E	PHMSA-2011-0023-0259	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0259
Summit Petroleum Corporation - Comments	PUBLIC SUBMISSIONS	1	Long	Robert	N/A	PHMSA-2011-0023-0429	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0429
Comment from Wesley Weber	PUBLIC SUBMISSIONS	N/A	Weber	Wesley	N/A	PHMSA-2011-0023-0138	Comment(s)	N/A	1	https://www.regulations.gov/document?D=PHMSA-2011-0023-0138
Comment from Carl Sack	PUBLIC SUBMISSIONS	N/A	Sack	Carl	N/A	PHMSA-2011-0023-0385	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0385
Comment from Kari Cutting	PUBLIC SUBMISSIONS	1	Cutting	Kari	N/A	PHMSA-2011-0023-0322	Comment(s)	pdf	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0322
Comment from Responsible Drilling Alliance	PUBLIC SUBMISSIONS	N/A	Alliance	Responsible Drilling	N/A	PHMSA-2011-0023-0406	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0406
Southern California Gas Company and San Diego Gas & Electric - Comment	PUBLIC SUBMISSIONS	1	Schneider	Douglas	Southern California Gas Company and San Diego Gas & Electric	PHMSA-2011-0023-0046	Comment(s)	pdf	1	https://www.regulations.gov/document?D=PHMSA-2011-0023-0046
Comment from Douglas Field	PUBLIC SUBMISSIONS	1	Field	Douglas	Southern Star Central Gas Pipeline, Inc.	PHMSA-2011-0023-0261	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0261
Comment from Christopher Lish	PUBLIC SUBMISSIONS	N/A	Lish	Christopher	N/A	PHMSA-2011-0023-0390	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0390
Comment from Scott Smyth	PUBLIC SUBMISSIONS	1	Smyth	Scott	N/A	PHMSA-2011-0023-0298	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0298
Southern Star Central Gas Pipeline, Inc. - Comment	PUBLIC SUBMISSIONS	2	Griffith	Beverly	Southern Star Central Gas Pipeline, Inc.	PHMSA-2011-0023-0042	Comment(s)	N/A	1	https://www.regulations.gov/document?D=PHMSA-2011-0023-0042
Comment from Terry Boss	PUBLIC SUBMISSIONS	1	Boss	Terry	N/A	PHMSA-2011-0023-0281	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0281
Comment from Natasha Leger	PUBLIC SUBMISSIONS	1	Leger	Natasha	N/A	PHMSA-2011-0023-0412	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0412
Southwest Gas Corporation - Comments	PUBLIC SUBMISSIONS	2	Moscoso	Rose	Southwest Gas Corporation	PHMSA-2011-0023-0066	Comment(s)	pdf	1	https://www.regulations.gov/document?D=PHMSA-2011-0023-0066
Spectra Energy - Comment	PUBLIC SUBMISSIONS	1	Kivela	Rick	Spectra Energy	PHMSA-2011-0023-0043	Comment(s)	pdf	1	https://www.regulations.gov/document?D=PHMSA-2011-0023-0043
Comment from Kim Van Fleet	PUBLIC SUBMISSIONS	1	Van Fleet	Kim	N/A	PHMSA-2011-0023-0362	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0362
Comment from Robert Kolb	PUBLIC SUBMISSIONS	N/A	Kolb	Robert	N/A	PHMSA-2011-0023-0204	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0204

Barbara Jarmoska - Comments	PUBLIC SUBMISSIONS	N/A	Jarmoska	Barbara	N/A	PHMSA-2011-0023-0061	Comment(s)	N/A	1	https://www.regulations.gov/document?D=PHMSA-2011-0023-0061
Comment from William Huston	PUBLIC SUBMISSIONS	2	Huston	William	N/A	PHMSA-2011-0023-0411	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0411
Comment from Catherine Reheis-Boyd	PUBLIC SUBMISSIONS	1	Reheis-Boyd	Catherine	N/A	PHMSA-2011-0023-0359	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0359
Comment from Jennifer Griffith	PUBLIC SUBMISSIONS	N/A	Griffith	Jennifer	N/A	PHMSA-2011-0023-0347	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0347
Gas Pipeline Advisory Committee Meeting	OTHER	1	N/A	N/A	N/A	PHMSA-2011-0023-0443	Assessment Docu	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0443
Comment from Perry Leitner	PUBLIC SUBMISSIONS	N/A	Leitner	Perry	N/A	PHMSA-2011-0023-0248	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0248
Comment from Anonymous Anonymous	PUBLIC SUBMISSIONS	1	Anonymous	Anonymous	SWN Midstream Services Company, LLC	PHMSA-2011-0023-0236	Comment(s)	pdf	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0236
Donal Stursma - Comment	PUBLIC SUBMISSIONS	1	Stursma	Donald	N/A	PHMSA-2011-0023-0109	Comment(s)	N/A	0	https://www.regulations.gov/document?D=PHMSA-2011-0023-0109
Comment from Luke Miller	PUBLIC SUBMISSIONS	1	Miller	Luke	N/A	PHMSA-2011-0023-0274	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0274
Comment from Mari Ruckel	PUBLIC SUBMISSIONS	1	Ruckel	Mari	Texas Oil and Gas	PHMSA-2011-0023-0326	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0326
Emily Kraffack - Comment	PUBLIC SUBMISSIONS	1	Kraffack	Emily	N/A	PHMSA-2011-0023-0029	Comment(s)	N/A	1	https://www.regulations.gov/document?D=PHMSA-2011-0023-0029
Texas Oil and Gas Association - Comment	PUBLIC SUBMISSIONS	1	Sebree	Ben	Texas Oil and Gas Association	PHMSA-2011-0023-0105	Comment(s)	pdf	1	https://www.regulations.gov/document?D=PHMSA-2011-0023-0105
TransCanada Corporation - Comments	PUBLIC SUBMISSIONS	1	Meier, Vice Presi	Vern	N/A	PHMSA-2011-0023-0103	Comment(s)	N/A	14	https://www.regulations.gov/document?D=PHMSA-2011-0023-0103
Comment from Janette Rosenbaum	PUBLIC SUBMISSIONS	N/A	Rosenbaum	Janette	N/A	PHMSA-2011-0023-0389	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0389
Safety of Gas Trans Appendix	SUPPORTING & RELATE	1	Cannon	Thure	Texas Pipeline Association	PHMSA-2011-0023-0423	Supplement	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0423
Comment from David Chislea	PUBLIC SUBMISSIONS	1	Chislea	David	N/A	PHMSA-2011-0023-0368	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0368
Texas Pipeline Association - Comment	PUBLIC SUBMISSIONS	1	Cannon	Thure	Texas Pipeline Association	PHMSA-2011-0023-0048	Comment(s)	pdf	1	https://www.regulations.gov/document?D=PHMSA-2011-0023-0048
Comment from Emily Kraffack	PUBLIC SUBMISSIONS	N/A	Kraffack	Emily	N/A	PHMSA-2011-0023-0388	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0388
Comment from Thure Cannon	PUBLIC SUBMISSIONS	1	Cannon	Thure	Texas Pipeline Association	PHMSA-2011-0023-0302	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0302
Comment from Caleb Laieski	PUBLIC SUBMISSIONS	N/A	Laieski	Caleb	N/A	PHMSA-2011-0023-0160	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0160
Comment from Randall Knapp	PUBLIC SUBMISSIONS	2	Knapp	Randall	N/A	PHMSA-2011-0023-0373	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0373
Comment from Nondestructive & Visual Inspection, LLC	PUBLIC SUBMISSIONS	1	Pahlajani	Prakash	N/A	PHMSA-2011-0023-0425	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0425
Comment from Elise Kucirka Salahub	PUBLIC SUBMISSIONS	N/A	Kucirka Salahub	Elise	N/A	PHMSA-2011-0023-0405	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0405
Comment from Frenae Smith	PUBLIC SUBMISSIONS	1	Smith	Frenae	N/A	PHMSA-2011-0023-0279	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0279
Comment from Texas Pipeline Association	PUBLIC SUBMISSIONS	1	Cannon	Thure	Texas Pipeline Association	PHMSA-2011-0023-0121	Comment(s)	jpg	1	https://www.regulations.gov/document?D=PHMSA-2011-0023-0121
Comment from Corinne Byrnes	PUBLIC SUBMISSIONS	1	Byrnes	Corinne	N/A	PHMSA-2011-0023-0260	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0260
The Kansas Corporation Commission - Comment	PUBLIC SUBMISSIONS	1	Haynos	Leo	The Kansas Corporation Commission	PHMSA-2011-0023-0009	Comment(s)	N/A	1	https://www.regulations.gov/document?D=PHMSA-2011-0023-0009
Comment from Jerry Tobe	PUBLIC SUBMISSIONS	N/A	Tobe	Jerry	N/A	PHMSA-2011-0023-0164	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0164
Comment from The Pennsylvania Public Utility Commission	PUBLIC SUBMISSIONS	1	Melia	James	The Pennsylvania Public Utility Commission	PHMSA-2011-0023-0433	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0433
Comment from Paul Oleksa	PUBLIC SUBMISSIONS	1	Oleksa	Paul	N/A	PHMSA-2011-0023-0361	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0361
Thomas Lael Services, L.P. - Comment	PUBLIC SUBMISSIONS	1	Lael	Thomas	Thomas Lael Services, L.P.	PHMSA-2011-0023-0041	Comment(s)	N/A	1	https://www.regulations.gov/document?D=PHMSA-2011-0023-0041
TransCanada - Comments	PUBLIC SUBMISSIONS	1	Meier	Vern	TransCanada	PHMSA-2011-0023-0096	Comment(s)	pdf	1	https://www.regulations.gov/document?D=PHMSA-2011-0023-0096
Comment from Richard Baumgartner	PUBLIC SUBMISSIONS	N/A	Baumgartner	Richard	N/A	PHMSA-2011-0023-0240	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0240
Comment from Lane Miller	PUBLIC SUBMISSIONS	N/A	Miller	Lane	TRC Solutions	PHMSA-2011-0023-0444	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0444
Ameren Illinois - Comments	PUBLIC SUBMISSIONS	1	Themig	Jerome	N/A	PHMSA-2011-0023-0071	Comment(s)	N/A	1	https://www.regulations.gov/document?D=PHMSA-2011-0023-0071
Comment from Robert Kitson	PUBLIC SUBMISSIONS	1	Kitson	Robert	N/A	PHMSA-2011-0023-0344	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0344
The Kansas Corporation Commission (KCC) - Comment	PUBLIC SUBMISSIONS	1	Haynos	Leo	N/A	PHMSA-2011-0023-0007	N/A	N/A	0	https://www.regulations.gov/document?D=PHMSA-2011-0023-0007
Tommy J. Cronk - Comment	PUBLIC SUBMISSIONS	N/A	Cronk	Tommy	Two Rivers Pipeline	PHMSA-2011-0023-0033	Comment(s)	N/A	1	https://www.regulations.gov/document?D=PHMSA-2011-0023-0033
U.S. DOT/PHMSA - Notes from Meeting with Pennsylvania Grade Crude Oil Coalition	SUPPORTING & RELATE	1	N/A	N/A	U.S. DOT/PHMSA	PHMSA-2011-0023-0438	Meeting Materials	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0438
David Pellam - Comments	PUBLIC SUBMISSIONS	N/A	Pellam	David	N/A	PHMSA-2011-0023-0088	Comment(s)	N/A	1	https://www.regulations.gov/document?D=PHMSA-2011-0023-0088
Comment from Michael Coy	PUBLIC SUBMISSIONS	N/A	Coy	Michael	N/A	PHMSA-2011-0023-0331	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0331
Comment from Todd Mall	PUBLIC SUBMISSIONS	1	Mall	Todd	N/A	PHMSA-2011-0023-0301	Comment(s)	pdf	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0301
Comment from John Lilley	PUBLIC SUBMISSIONS	N/A	Lilley	John	N/A	PHMSA-2011-0023-0140	Comment(s)	N/A	1	https://www.regulations.gov/document?D=PHMSA-2011-0023-0140
Comment from Eleanor Shoup	PUBLIC SUBMISSIONS	N/A	Shoup	Eleanor	N/A	PHMSA-2011-0023-0206	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0206

U.S. DOT/PHMSA - Report to Congress - Evaluation of Expanding Pipeline Integrity Management Beyond High-Consequence Areas and Whether Such Expansion Would Mitigate the Need for Gas Pipeline Class Location Requirements - Pipeline Safety, Regulatory Certainty, And Job Creation Act 2011, Section 5	OTHER	1	N/A	N/A	U.S. DOT/PHMSA	PHMSA-2011-0023-0153	Supplement (SUF	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0153
Comment from Jonathan Strong	PUBLIC SUBMISSIONS	5	Strong	Jonathan	N/A	PHMSA-2011-0023-0162	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0162
Comment from Robert Ehlers	PUBLIC SUBMISSIONS	1	Ehlers	Robert	Valero Terminaling and Distribution Company	PHMSA-2011-0023-0335	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0335
Comment from Thomas Marlow	PUBLIC SUBMISSIONS	2	Marlow	Thomas	Vectren Corporation	PHMSA-2011-0023-0287	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0287
Comment from Ian Landon	PUBLIC SUBMISSIONS	1	Landon	Ian	Virginia Oil and Gas	PHMSA-2011-0023-0289	Comment(s)	pdf	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0289
U.S DOT/PHMSA - Comments of Peoples Natural Gas Company, LLC	OTHER	1	N/A	N/A	N/A	PHMSA-2011-0023-0426	Supplemental Co	pdf	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0426
Marcellus Shale Coalition - Extension Request	OTHER	1	N/A	N/A	N/A	PHMSA-2011-0023-0135	Acknowledgemen	N/A	1	https://www.regulations.gov/document?D=PHMSA-2011-0023-0135
Waste Management, Inc. - Comments	PUBLIC SUBMISSIONS	1	Kelly	Kerry	Waste Management, Inc.	PHMSA-2011-0023-0094	Comment(s)	N/A	1	https://www.regulations.gov/document?D=PHMSA-2011-0023-0094
Alaska Natural Gas Development Authority	PUBLIC SUBMISSIONS	1	Laughlin	Kaye	N/A	PHMSA-2011-0023-0014	Comment(s)	pdf	1	https://www.regulations.gov/document?D=PHMSA-2011-0023-0014
Comment from Robert Workman	PUBLIC SUBMISSIONS	N/A	Workman	Robert	N/A	PHMSA-2011-0023-0184	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0184
Comment from Rebecca Alwin	PUBLIC SUBMISSIONS	N/A	Alwin	Rebecca	N/A	PHMSA-2011-0023-0408	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0408
Comment from Glenn Rosen	PUBLIC SUBMISSIONS	N/A	Rosen	Glenn	N/A	PHMSA-2011-0023-0214	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0214
Williams Gas Pipeline - Comments	PUBLIC SUBMISSIONS	2	Barnard	Randy	Williams Gas Pipeline	PHMSA-2011-0023-0098	Comment(s)	pdf	1	https://www.regulations.gov/document?D=PHMSA-2011-0023-0098
State of Alaska - Comment	PUBLIC SUBMISSIONS	1	Laughline	Kaye	N/A	PHMSA-2011-0023-0020	Comment(s)	pdf	1	https://www.regulations.gov/document?D=PHMSA-2011-0023-0020
Comment from Roberta Winters	PUBLIC SUBMISSIONS	N/A	Winters	Roberta	N/A	PHMSA-2011-0023-0404	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0404
WKM Consultancy, LLC - Comment	PUBLIC SUBMISSIONS	1	Muhlbauer	W. Kent	WKM Consultancy, LLC	PHMSA-2011-0023-0026	N/A	N/A	0	https://www.regulations.gov/document?D=PHMSA-2011-0023-0026
Comment from thomas west	PUBLIC SUBMISSIONS	N/A	west	thomas	N/A	PHMSA-2011-0023-0403	Comment(s)	N/A	N/A	https://www.regulations.gov/document?D=PHMSA-2011-0023-0403

Attachment B

Good Afternoon eRulemaking Advisory Board (AB) & Change Control Board (CCB) members,

Thank you for your participation in the 12/1/2020 joint meeting of the eRulemaking AB & CCB!

In addition to providing the meeting minutes, we have two important areas for follow-up:

1) You requested a message from GSA summarizing the significant changes to service involved with the production release of FDMS 5 on December 17, 2020.

We want to reiterate the challenging environment eRulemaking faces going into FY21. As you know, since October 1, 2019, when the Office of Regulation Management was established, GSA's foremost priority has been to maintain continuity of service for eRulemaking partner agencies. GSA has made significant progress in securing and stabilizing the eRulemaking system along with addressing the issue of "fake" comments. However, time and financial constraints for continuity of service have become barriers to further progress.

The software for the current version 4 of FDMS relies on Adobe Flash, which will no longer be supported by web browsers after December 31, 2020. This put GSA under a challenging timeline to replace the software only 14 months after assuming ownership of the eRulemaking systems on October 1, 2019. Although GSA will be able to release version 5 of FDMS before the December 31 deadline, only certain core functions required by agencies will be included with the initial release on December 17, 2020.

The following key features will not be immediately available on December 17, but GSA has the resources to support them in early calendar year 2021. For additional background, see the attachment with short descriptions of the functions:

- Deduplication: GSA will support this service through a manual workaround until sufficient resources are available to fully restore the service. See the attached tip sheet for guidance on implementing the workaround.
- Bulk upload: GSA will also support this service through a manual workaround until this feature can be deployed in February 2021. Please see the attached tip sheet for guidance.
- Work queue: GSA plans to deliver Work Queue in April 2021.

GSA planned to develop other critical FDMS functions in FY21 using \$1 million in appropriated funds requested in the President's Budget. However, GSA understands that this funding is not included in either the House or Senate FY21 full year appropriations legislation. This \$1M appropriation would be needed to implement Multi Factor Authentication, including Cross Agency Accounts

The other key features listed below are not within our current available FY21 budget. On top of the \$1M appropriation, the estimated cost to develop these functions, as well as other key development requested for Regulations.gov, is \$1.6M.

- Deduplication: Aside from continuing to support the workaround, GSA will not be able to restore the full service to FDMS 5 in FY21.
- Bulk extract

The attachment provides a more comprehensive list of functions that cannot be supported with our FY21 budget, including descriptions.

GSA recognizes the critical role that rulemaking plays in delivering agency mission priorities. Our goal is to continue to collaborate with you to balance the need for security and delivery of core functionality against technical risk, within our constrained budget. Thank you for your collaboration today as we work through a path forward.

Attachment C



Office of Regulation Management
Office of Government-wide Policy
U.S. General Services Administration

A photograph of a large, multi-story government building with a classical architectural style, featuring a prominent corner with a pediment and a flagpole flying the U.S. flag. The building is partially obscured by lush green trees in the foreground. The sky is blue with scattered white clouds.

eRulemaking Update Office of Regulation Management

December 15, 2020

Agenda - December 15, 2020

Key Purpose: Updates on FDMS and transition to new Regulations.gov

- Budget Outlook for FY21
- FDMS 5 Rollout:
 - Planning and preparation
 - Overview
 - Workaround support
- Regulations.gov Rollout:
 - Oversight engagements: Senate and GAO
 - Measures planned before rollout:
 - Terms and conditions
 - Third party validation
- Governance Schedule

Remarks from ESC Co-Chairs



Dominic Mancini

Deputy Administrator

Office of Information and Regulatory Affairs

Office of Management and Budget



Jessica Salmoiraghi

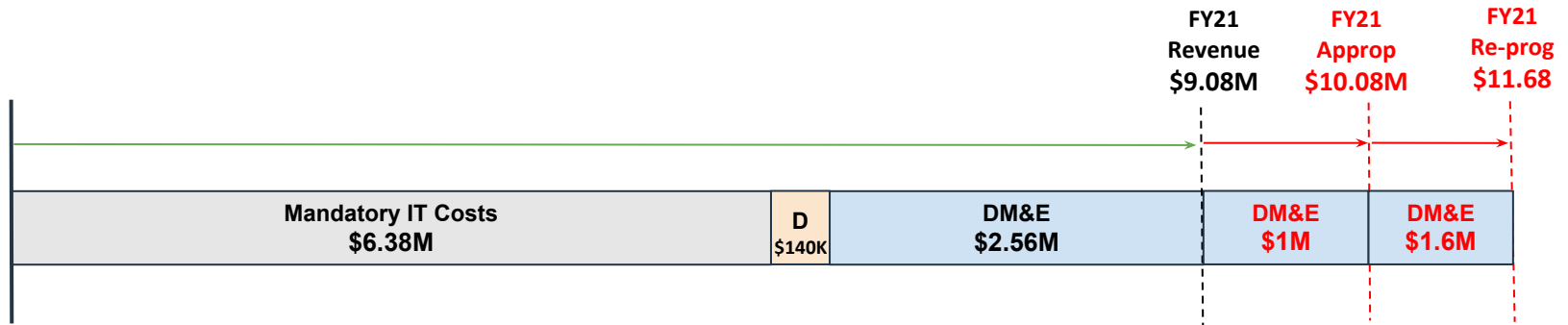
Associate Administrator

Office of Government-wide Policy

General Services Administration

FY21 Budget Outlook - Re-baselined Budget

Available FY21 Budget: \$9.08M



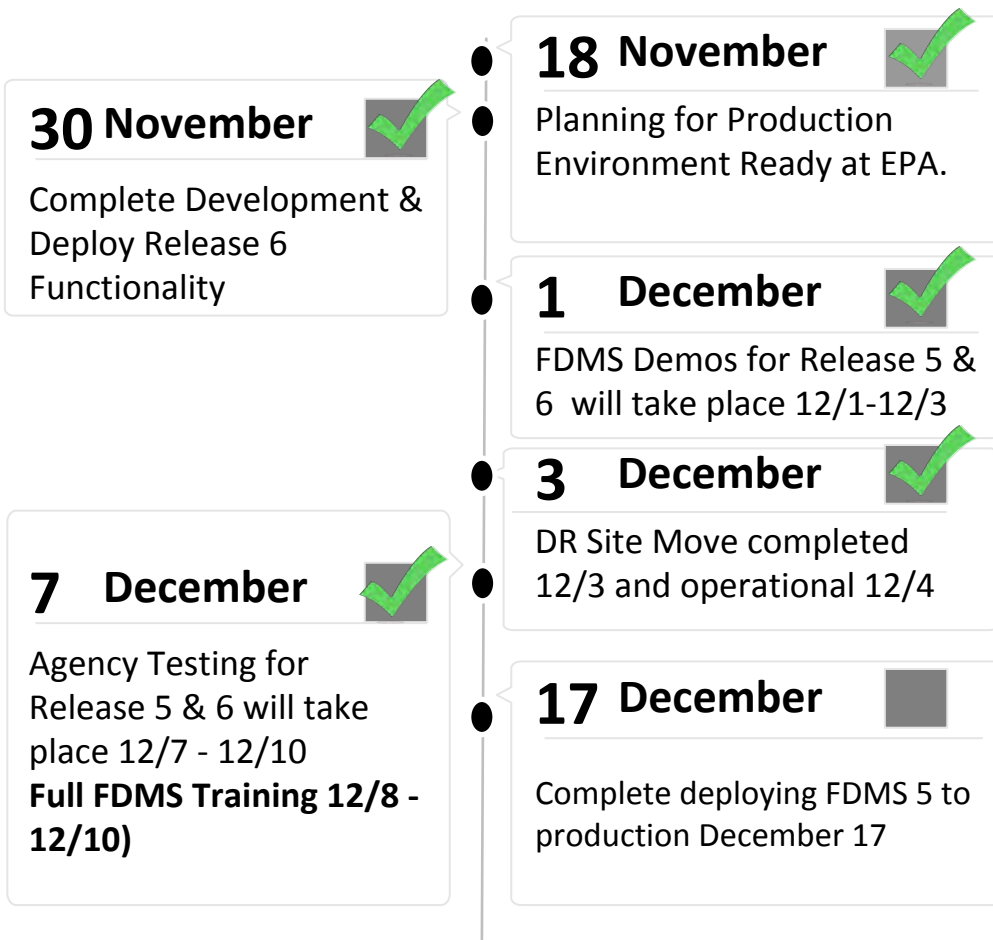
Current FY21 Budget	
Baseline functions	
FDMS	REGS
Bulk Import (Feb/March)	Comment API
Work Queue (June/July)	Beta Cutover
Dedup workaround	

\$1M Appropriation	
Additional functions	
FDMS	REGS
Bulk Import	Comment API
Work Queue	Beta Cutover
Dedup workaround	
Cross-agency accts	
MFA	

\$1.6M Reprogram	
Additional functions	
FDMS	REGS
Bulk Import	Comment API
Work Queue	Beta Cutover
Dedup (full solution)	Bulk Download
Cross-agency accts	Search posted comments TBD
MFA	
Bulk Extract	

FDMS 5 Rollout - Planning and Preparation

Release Planning and User Training



Other Communications

Emails:

- 12/1 and 12/4: FDMS Users
 - Cross-agency accounts
 - Overview of FDMS 5 changes
 - Workaround guidance
 - Resources
- 12/3: Governance members

Webinars:

- 12/7 and 12/8: FDMS Agency Admins
 - Cross agency accounts
- 12/9: Specific POCs
 - Workaround Requests

Resources:

- Emailed and made available on Max.gov
 - Workaround guidance
 - Cross agency accounts
 - FDMS user guides

FDMS 5 Rollout - Workaround Support

- \$200K set aside for workaround requests
 - \$175K for bulk uploads
 - \$25K for deduplication requests
- Workaround resources will be allocated to agencies based on projected need
- The PMO will provide bi-weekly status to partner agencies
- Agencies will also be asked to submit biweekly updates on their regulatory activity via eRulemaking@gsa.gov, which will inform resource allocation

Bulk Import Requests - Getting the Best Value

- Close Coordination
 - Single POC for each partner agency
 - eRulemaking PMO staff will process and track requests
- Streamline requests:
 - Minimize complexity
 - Fewer dockets/documents
 - Focus on documents with highest number of comments
 - Minimize repeat requests for the same document
 - Group requests together after receiving a high quantity of comments instead of providing frequent, small requests

Protecting the Integrity of Rulemaking

While software-generated comments can be the source of “fake” comments, many such comments are submitted on behalf of real persons via industry, lobbying, non-profit, or other organizations.

Regulations.gov Classic

Access by Bots:

- External software “scrapes” the Regulations.gov web application and assesses navigable paths.
- Submissions are then generated by bots instead of people, resulting in “fake” comments.
- Risk of denial of service attacks.

Management of Bots:

- Minimal ability to control volume intake of comments, resulting in higher risk of system crashes.
- System cannot distinguish between people and bots.
- No ability to discern which comments are “fake.”
- No ability to identify sources of “fake” comments.
- No audit trail and no accountability for identity fraud or other illegal acts.

Regulations.gov Beta

Access by Bots:

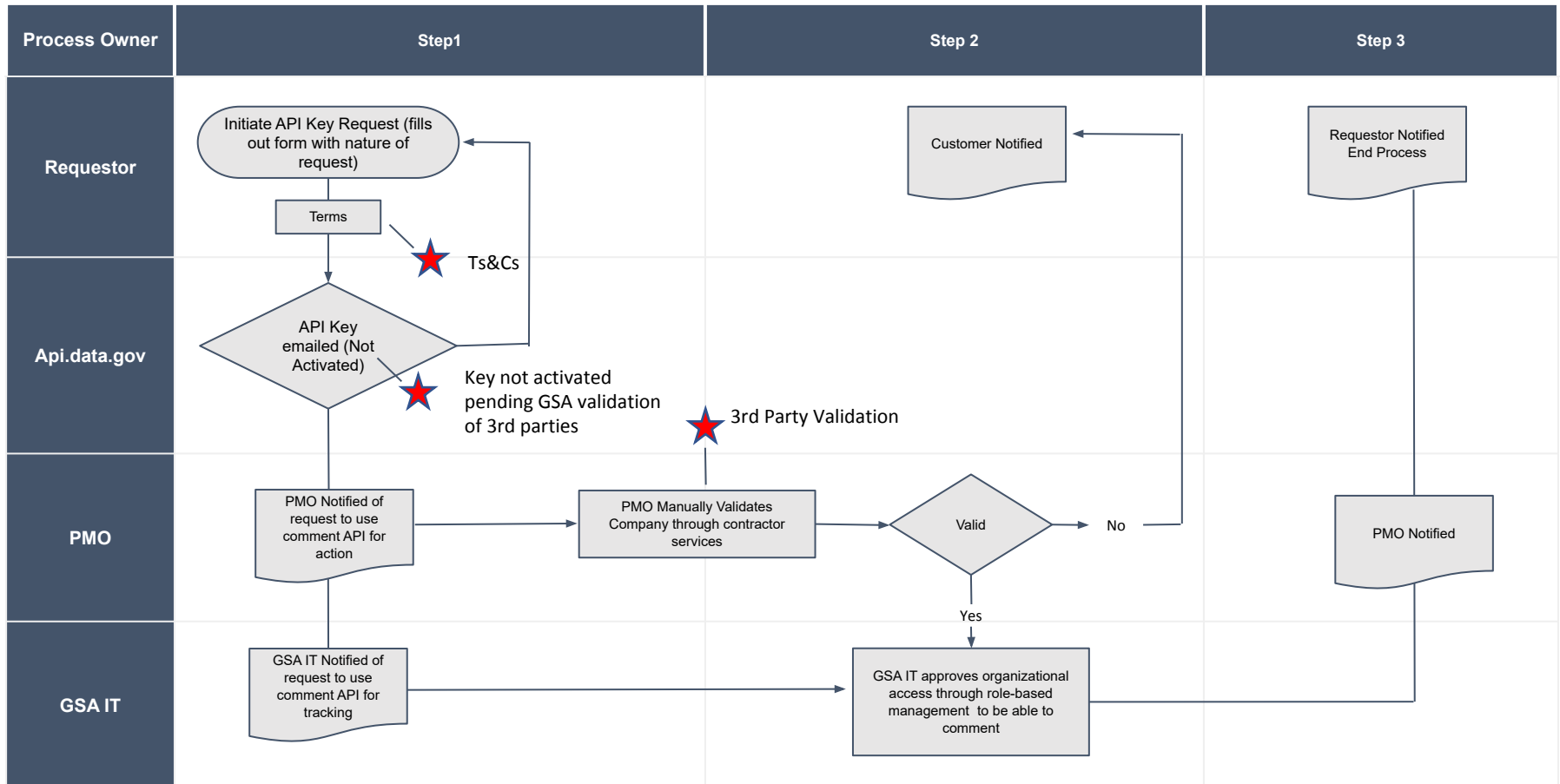
- reCAPTCHA defeats software.
- Submissions through Regulations.gov are limited to those generated by people.

Management of Bots:

- Use of an Application Programming Interface (API) sets up a private pathway to submit comments to the system. Only organizations with the GSA-issued key can access this pathway; key is easily revocable.
- Organizations must agree to Terms & Conditions.
- Acquisition of services to validate the identities of API users is underway.
- Rate limit restrictions can prevent mass submissions from crashing the system.
- Comments submitted through the API are traceable to a particular organization.
- This traceability can be used by Inspectors General or other law enforcement entities to prosecute sources of “fake” comments.

Validation Process for API Users

GSA is in process of acquiring third party identify validation services to augment the API Key Registry process



API Key Registration now includes Terms & Conditions

The eRulemaking post Application Programming Interface (API), informally referred to as the Comment API, is provided as a convenience to facilitate the bulk upload of comments from a number of different commenters. The use of the Comment API requires a key, which may be obtained through the [open GSA](#) website.

By registering for, receiving and using a key to the Comment API, the key holder agrees to the following terms and conditions:

1. When developing interfaces for commenters who will submit comment language and/or attachments through the Comment API, the key holder will include in the interface:
 - A link to the same [terms of participation](#) and [privacy notice](#) that users encounter on the comment form for Regulations.gov, and
 - A link to the Federal Register notice or other specific document in Regulations.gov for which the key holder is collecting or facilitating comments to be delivered through the Comment API.
2. The key holder certifies that:
 - it will only submit comments through the Comment API that it has gathered through lawful means and that, to the best of the key holder's knowledge, represent comments from real persons, and
 - It has not and will not submit comments of its own creation under fictitious or misappropriated identities or otherwise in violation of federal law.
3. The API key may be disabled if an API key holder is determined to have violated these Terms of Participation.

Beta Regulations.gov Rollout - Validation Service

- Based on feedback from HSGAC and the Department of Education, GSA is maintaining the legacy version until after implementation of entity validation services. There is limited capacity to continue to support the legacy version.
- Acquisition of services may take three months, at which time GSA will decommission the legacy system and cutover to new Regulations.gov site (formerly beta).
 - Goal is to achieve the right balance of price point/level of validation and incorporate ongoing identity validation into the service.
 - Current estimate is \$10K per year
- Six entities are part of the API pilot and will be permitted to move forward with the API to test the process of accepting the new Terms & Conditions. The validation services will be applied when available.

Regulations.gov Oversight - GAO

Government Accountability Office

- Nov 18, 2020: **One active inquiry** split into two job codes
 - 103181 is for the non-participating agencies FCC and SEC.
 - **104250** is for **eRulemaking PMO** and a subset of the partner agencies: **BLM; CMS; CFPB; EBSA; EPA; FDA; FWS; WHD**
- Focused on comments:
 - Characteristics of submissions
 - Challenges reviewing/analyzing
 - Confirmation/consent of commenters
 - Information collected during submissions.
- Past inquiries
 - [GAO-19-483](#) (102648): Practices - Identity Information
 - [GAO-20-383R](#) (102939): Management of Public Comments

Governance Schedule

1/13: CCB

- Prioritization of FDMS phase 2 functions

1/27: AB

- Future business requirements validation
- Forecast of additional sub-group engagements
 - Inputs for contract requirements
 - Federal Integrated Business Framework analysis

3/17: ESC

- Status of FDMS phase 2
- AB recommendations for future business requirements
- Forecast for late summer budget planning
 - FY22 re-baseline
 - FY23 budget

Background slides

FDMS 5 Overview: Improved Look and Feel on an Updated Technology Stack

Here is a look at the immediately available features, as well as deferred functionalities:

FDMS Features available at December 17 Cutover:	FDMS Features to be added in CY 2021:	FDMS Features to be added in CY 2021 pending resource availability:
<ul style="list-style-type: none">•Homepage – Login page, quick search, menu•Document Management – Tabs, actions•Docket Management – docket details, docket tree•File Upload & Attachment•User Profile (Info and Password)•Deduplication workaround•Docket assignments•Records Management	<ul style="list-style-type: none">•Bulk Upload•Work Queue	<ul style="list-style-type: none">•MFA Security Requirement•Cross-Agency Accounts•Docket/Document Permissions•Additional Document Actions•Deduplication (full functionality)•Bulk Extract

Overview of FDMS 5 Functions at Go-Live

The following capabilities will be included in FDMS 5 go live in December 2020:

- Login Page
- Homepage
 - Quick Search
 - Menu (FR Feed and Inbox)
- Logout Framework
- User Profile (Info and Password)
- Footer
- Incorporate Training Resources
- Document Management
 - Document Tabs
 - Document Actions (Move, Post, & Save)
- Docket Management
 - Docket Details
 - Add Docket
 - Docket Actions (Save)
 - Docket Structure
 - Docket Assignments
- File Upload & Attachment
 - Add Document/File Upload
 - Document Attachments Tab
 - Document Attachments Actions (Save)
- Records Management Minimum Viable Product
- Deduplication workaround

Bulk Uploads Workaround Resource Allocation Plan

- Workarounds will be funded by GSA within existing budget. The following represents an estimated allocation of resources based on current priorities.
- Biweekly updates regarding remaining resources will inform agency discussions for reprioritization of remaining workarounds.
- Top 9 agencies by regulatory activity is listed below along with funds reserved for other agencies.
- The PMO coordinate closely with agencies as circumstances evolve.

	December	January	February	March
EPA	\$13,768	\$6,159	\$4,284	\$1,853
DOC	\$11,972	\$5,543	\$1,836	\$2,470
TREAS	\$11,374	\$3,696	\$612	\$0
DOT	\$8,979	\$2,464	\$1,224	\$4,323
USDA	\$8,381	\$4,312	\$3,060	\$1,235
STATE	\$8,381	\$4,312	\$2,448	\$2,470
DHS	\$7,782	\$1,848	\$612	\$2,470
HHS	\$7,183	\$8,623	\$4,284	\$3,705
DOL	\$3,592	\$1,848	\$612	\$3,088
OTHERS	\$8,400	\$2,800	\$1,500	\$1,500
	\$89,811	\$41,604	\$20,472	\$23,113

Bulk Import Requests - Limited Capacity to Meet Demand

Examples for Low/High Requests

	“Low” Bulk Import Request \$1400	“High” Bulk Import Request \$2800
Bulk Import	<ul style="list-style-type: none"> An agency has 1 docket with 1 document currently open for comment. This document receives about 1500 comments. Any agency has 1 docket with 1 document currently open for comment. This document receives about 2000 comments. The agency submits two requests throughout the comment period to upload 1000 comments at a time. 	<ul style="list-style-type: none"> An agency has 2 dockets each with 10 documents currently open for comment. Each document receives between 50-1000 comments. The agency completes the templates, designating the 20 documents with the 15,000 comments that need to be uploaded. There is some back and forth to make sure all data is captured. An agency has 1 docket with 1 document receiving 500k comments. The agency submits multiple requests to upload comments throughout the comment period

Case Study - EPA Requests in December (\$14K)

Bulk Upload Requests	
Low	6
High	2

Attachment D

Regs Beta: Rare limit increase request ISSUE=3787 PROJ=46

Regulations.gov Help Desk regulations@erulemakinghelpdesk.com via amazonses.com

Mar 1, 2021, 10:40 AM

to [REDACTED]

When replying, type your text above this line.

Notification of Request Change

The following changes have been made to this Request: *Changed Status to Closed from Open, Changed Request data or Contact data, Changed most recent Description, Appended a Additional Comments., Added Assignee : Helpdesk.*

Workspace: Regs BetaII
Request: Regs Beta: Rare limit increase request
Request Number: 3787

Priority: Working **Status:** Closed
Date: 03/01/2021 **Time:** 13:39:43
Creation Date: 03/01/2021 **Creation Time:** 13:10:01
Created By: RegsUser

[Click here to view Request in Browser](#)

Additional Comments:

Entered on 03/01/2021 at 13:39:43 EST (GMT-0500) by Pat M:

Thank you for reaching out to Regulations.gov regarding API V4. For information pertaining to the rollout of API V4 including updating rate limits, please send your inquiry to the following email address:

erulemakingapi@gsa.gov

Thank you,
Regulations.gov Help Desk

Entered on 03/01/2021 at 13:39:43 EST (GMT-0500) by Pat M:

Hello! I am requesting an increase to my rate limit for the GSA [regulations.gov](https://open.gsa.gov/api/regulationsgov/) API. The documentation on your site (<https://open.gsa.gov/api/regulationsgov/>) refers developers to the [data.gov](https://api.data.gov/docs/rate-limits/) page (<https://api.data.gov/docs/rate-limits/>) which asks that any rate limit increase request be sent to the controlling agency for the API (GSA in this case). My current limit is the default 1,000 per hour limit. I would like an increase to a minimum of 6,000 API requests per hour.

Reasoning: I am building a lightweight web-based tool for exploring comments on dockets/documents for legal professionals (this is functionality currently missing from the new [regulations.gov](https://open.gsa.gov/) website). This is a NON-PROFIT web application and will never charge users. I am requesting my limit be increased to support for than a couple users at a time. Even with a very small user population the API requests pile up into the hundreds. The reason is that every document that users want to get detailed comments for requires separate API calls for every comment. For example, if a user is looking at document X and there are 139 comments on it, I will need to make 140 API requests (the document plus each comment).

A single legal professional may look at the comments on a dozen documents in a day across a few different docket numbers. And I hope to support more than a couple professionals using the app per day. In addition to this rate limit increase, I have implemented temporary server-side caching of records and comments to prevent quick-succession, repeat hits to the API.

My math for API usage estimation for DAILY limit:

$(1 \text{ docket} + \text{average } 3 \text{ documents} + \text{average } 100 \text{ comments}) * 5 \text{ dockets per day} = 520 \text{ API calls per user per day.}$

To support 100 users per day:

$(520 \text{ calls per day} * 100 \text{ users}) / 9 \text{ hours per day} = 5,778 \text{ API requests per hour}$

Thank you in advance. If you are interested, the entire code for the application is open source here:

[REDACTED]

Current Assignees: Helpdesk

Request Information:

Question or Comment: Question

Contact Information:

Last Name: [REDACTED] First Name:

[REDACTED]

Email address: [REDACTED] Phone #: [REDACTED]



[REDACTED]

Mar 1, 2021, 10:57 AM



to erulemakingapi ▾

Hello! I sent the request below to the [regulations.gov](https://www.regulations.gov) support desk, but they indicated that I should send the request to this address. Please see my request below to increase my API rate limit. Happy to provide any additional context or information.

[REDACTED]

...



[REDACTED]

Mar 10, 2021, 9:16 AM



to erulemakingapi ▾

Hello, I have not heard anything back on this request. Any update?

[REDACTED]

...



eRulemaking API <erulemakingapi@gsa.gov>

Mar 10, 2021, 11:29 AM



to eRulemaking, [REDACTED] ▾

Hi [REDACTED],

Apologies for the delay. **Unfortunately, we are not increasing rate limits beyond 2000 requests/hour at this time. I have increased your rate limit to 2000 requests/hour.**

Thanks,
eRulemaking Team.

...

...

You received this message because you are subscribed to the Google Groups "eRulemaking API" group.

To unsubscribe from this group and stop receiving emails from it, send an email to erulemakingAPI+unsubscribe@gsa.gov.

To view this discussion on the web visit <https://groups.google.com/a/gsa.gov/d/msgd/erulemakingAPI/CALT4n5PSIufA3aFXRi5TUewi5iOac%3D%2Bx%2B-xiALqe4EiQN8dTg%40mail.gmail.com>.



Regs Beta: Rare limit increase request ISSUE=3787 PROJ=46

1 message

Regulations.gov Help Desk <regulations@erulemakinghelpdesk.com>

Mon, Mar 29, 2021 at 11:37 AM

Reply-To: regulations@erulemakinghelpdesk.com

To: [REDACTED]

When replying, type your text above this line.

Notification of Request Change

The following changes have been made to this Request: *Appended a Additional Comments.*

Workspace: Regs BetaII
Request: Regs Beta: Rare limit increase request
Request Number: 3787

Priority: Working **Status:** Open
Date: 03/29/2021 **Time:** 14:37:32
Creation Date: 03/01/2021 **Creation Time:** 13:10:01
Created By: RegsUser

[Click here to view Request in Browser](#)

Additional Comments:

Entered on 03/29/2021 at 14:37:32 EDT (GMT-0400) by Pat M:

Your email to the Regulations.gov Help Desk has been forwarded to the eRulemaking Program Management Office for review.

Entered on 03/25/2021 at 20:03:45 EDT (GMT-0400) by Pat M:

Thanks for the information. How do I request a permanent higher limit?

The 1000 per hour limit is incongruous with the structure of the API, making it an unreasonable barrier to access the data. A simple example is document number HHS-OCR-2019-0007-0001 (<https://www.regulations.gov/document/HHS-OCR-2019-0007-0001>). It has (according to [regulations.gov](https://www.regulations.gov)) 155,966 comments. In order for a system built on your API with those limits to retrieve all comments (paged, of course) to display to a user would take 156 hours, or over 6 and a half days. For one document. An API limit of 1000 requests per hour, given the fact that even moderately detailed comment information such as the author and attachment list, is not usable by any single individual let alone a system to support multiple users.

Please inform me when rate limits will be increased or the API data structure will be changed to support use of this API for retrieving comments.

I will be copying my attorney on this support ticket to determine if this restriction violates any current administration policies or regulations - or any laws - on open access to data.

[REDACTED]

On Thu, Mar 25, 2021 at 2:11 PM Regulations.gov Help Desk <regulations@erulemakinghelpdesk.com> wrote:

> [Duplicate message snipped]

Entered on 03/25/2021 at 14:10:50 EDT (GMT-0400) by Pat M:

Your API rate increase was temporary. Rate increase requests that are approved are approved for a two-week time limit at the higher amount. After two weeks the key reverts back to the default 1000 calls per hour.

Regulations.gov Help Desk

Entered on 03/25/2021 at 14:10:50 EDT (GMT-0400) by Pat M:

Sorry, but why was my rate limit reverted back to 1000 per hour? The previous notification indicated that it had been increased to 2000 per hour and I did not request the limit to be reverted. Is there a reason behind this change?

- [REDACTED]

On Thu, Mar 25, 2021 at 12:37 PM Regulations.gov Help Desk <regulations@erulemakinghelpdesk.com> wrote:

> [Duplicate message snipped]

Entered on 03/25/2021 at 12:36:25 EDT (GMT-0400) by Fran L:

Hi [REDACTED],

Your rate limit for the API key has been reverted to the default rate of 1,000 Calls per hour.

Thank you,
Regulations.gov Help Desk

Entered on 03/01/2021 at 13:39:43 EST (GMT-0500) by Pat M:

Thank you for reaching out to Regulations.gov regarding API V4. For information pertaining to the rollout of API V4 including updating rate limits, please send your inquiry to the following email address:

erulemakingapi@gsa.gov

Thank you,
Regulations.gov Help Desk

Entered on 03/01/2021 at 13:39:43 EST (GMT-0500) by Pat M:

Hello! I am requesting an increase to my rate limit for the GSA [regulations.gov](https://open.gsa.gov/api/regulationsgov/) API. The documentation on your site (<https://open.gsa.gov/api/regulationsgov/>) refers developers to the [data.gov](https://api.data.gov/docs/rate-limits/) page (<https://api.data.gov/docs/rate-limits/>) which asks that any rate limit increase request be sent to the controlling agency for the API (GSA in this case). My current limit is the default 1,000 per hour limit. I would like an increase to a minimum of 6,000 API requests per hour.

Reasoning: I am building a lightweight web-based tool for exploring comments on dockets/documents for legal professionals (this is functionality currently missing from the new regulations.gov website). This is a NON-PROFIT web application and will never charge users. I am requesting my limit be increased to support for than a couple users at a time. Even with a very small user population the API requests pile up into the hundreds. The reason is that every document that users want to get detailed comments for requires separate API calls for every comment. For example, if a user is looking at document X and there are 139 comments on it, I will need to make 140 API requests (the document plus each comment).

A single legal professional may look at the comments on a dozen documents in a day across a few different docket numbers. And I hope to support more than a couple professionals using the app per day. In addition to this rate limit increase, I have implemented temporary server-side caching of records and comments to prevent quick-succession, repeat hits to the API.

My math for API usage estimation for DAILY limit:

$(1 \text{ docket} + \text{average } 3 \text{ documents} + \text{average } 100 \text{ comments}) * 5 \text{ dockets per day} = 520 \text{ API calls per user per day.}$

To support 100 users per day:

$((520 \text{ calls per day} * 100 \text{ users}) / 9 \text{ hours per day}) = 5,778 \text{ API requests per hour}$

Thank you in advance. If you are interested, the entire code for the application is open source here:

[REDACTED]

-- [REDACTED]

Current Assignees: Helpdesk

Request Information:

Question or Comment: Question

Contact Information:

Last Name: [REDACTED] **First Name:**

[REDACTED]

Email address: [REDACTED] **Phone #:** [REDACTED]