

Comment from Democracy Forward on *Mass, Computer-Generated, and Fraudulent Comments*  
May 24, 2021

My organization and eight other public interest organizations recently submitted the attached letter to GSA outlining our concerns regarding the new version of Regulations.Gov. We believe it may be of interest to the ACUS Committee on Rulemaking. Please treat this email and attachment as a formal comment submission to the Committee.

We are happy to answer any questions you might have.

Samara Spence,  
Democracy Forward



May 17, 2021

**VIA ELECTRONIC MAIL**

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U.S. General Services Administration

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

Democracy Forward and eight other public interest organizations (“Signatory Organizations”)<sup>1</sup> 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.<sup>2</sup>

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<sup>1</sup> 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.

<sup>2</sup> 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.<sup>3</sup> 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.<sup>4</sup> 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.<sup>5</sup>

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

<sup>4</sup> *Id.* § 206(a).

<sup>5</sup> *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.<sup>6</sup> 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.<sup>7</sup>

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

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.”<sup>11</sup> 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.<sup>12</sup> 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.<sup>13</sup> 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.”<sup>14</sup>

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<sup>6</sup> 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”).

<sup>7</sup> *Id.*; 84 Fed. Reg. at 2143.

<sup>8</sup> 84 Fed. Reg. at 2143.

<sup>9</sup>*Id.*

<sup>10</sup> *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.*

<sup>11</sup> *Id.*

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

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

<sup>14</sup> 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.<sup>15</sup> But complex rulemakings may have tens or even hundreds of thousands of comments submitted by advocacy groups, regulated entities, and private individuals.<sup>16</sup> 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.”<sup>17</sup> 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.<sup>18</sup> HHS itself has acknowledged the public value of this effort; the errors identified in Democracy Forward’s litigation convinced

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<sup>15</sup> *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.”).

<sup>16</sup> 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>.

<sup>17</sup> *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).

<sup>18</sup> 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.<sup>19</sup> 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.<sup>20</sup>

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.<sup>21</sup> 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.<sup>22</sup> 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.<sup>23</sup> 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.”<sup>24</sup> 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

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<sup>19</sup> 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”).

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

<sup>21</sup> 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.

<sup>22</sup> *Id.*

<sup>23</sup> 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/>.

<sup>24</sup> 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.”<sup>25</sup> 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.<sup>26</sup> 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.”<sup>27</sup> 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.<sup>28</sup> 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.<sup>29</sup> Slides from the second town hall meeting similarly focus on the management of mass and fake comments as well as agency use of comments.<sup>30</sup> 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.<sup>31</sup> 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.<sup>32</sup>

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<sup>25</sup> GSA Comments to Senate Committee.

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

<sup>27</sup> *Id.*

<sup>28</sup> See 84 Fed. Reg. 72,364 (Dec. 31, 2019).

<sup>29</sup> Tr. GSA, *Mass & Fake Comments: Public Meeting* (Jan. 30, 2020), available at [https://downloads.regulations.gov/GSA-GSA-2019-0002-0028/attachment\\_1.pdf](https://downloads.regulations.gov/GSA-GSA-2019-0002-0028/attachment_1.pdf).

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

<sup>31</sup> *Id.* Slides 49-53.

<sup>32</sup> 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.<sup>33</sup>

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."<sup>34</sup> 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.<sup>35</sup> However, the Trump administration requested only \$1 million and received less.<sup>36</sup> 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.<sup>37</sup> GSA reported that it would "not be able to restore the full service" or implement many "key features" in fiscal year 2021.<sup>38</sup> Of the features that were planned, nearly all were focused on the agency-side FDMS system or other

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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.

<sup>33</sup> 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!").

<sup>34</sup> Attachment B.

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

<sup>36</sup> *Id.*

<sup>37</sup> *Id.*

<sup>38</sup> *Id.*



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

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.<sup>41</sup> 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.”<sup>42</sup> 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.

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

<sup>40</sup> *Id.* at 4.

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

<sup>42</sup> *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.”<sup>43</sup> 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

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<sup>43</sup> *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.”<sup>44</sup> Congress, courts, and the public rely on “the transparent nature of administrative record building” to “facilitate[] accountability” of the agencies.<sup>45</sup> 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.”<sup>46</sup>

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](https://api.Regulations.Gov).<sup>47</sup>
- 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”;

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<sup>44</sup> 44 U.S.C. § 3506(b)(1)(C).

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

<sup>46</sup> *Id.* at 407.

<sup>47</sup> <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.<sup>48</sup> Doing so would be consistent with Section 5 of the Federal Source Code Policy, as established by M-16-21.<sup>49</sup> 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

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<sup>48</sup> 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).

<sup>49</sup> 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](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.”<sup>50</sup> 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](mailto:sspence@democracyforward.org), [ageorge@democracyforward.org](mailto: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

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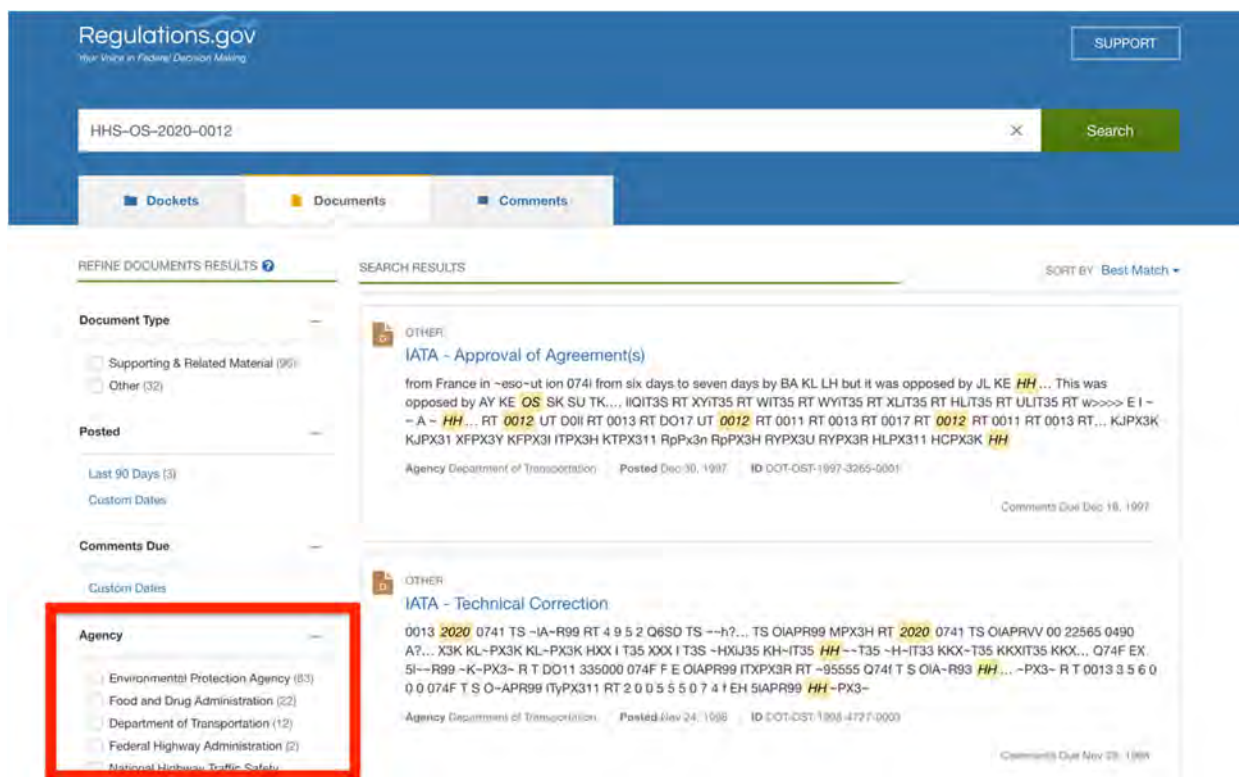
<sup>50</sup> Memorandum on Transparency and Open Government, 74 Fed. Reg. 4685 (Jan. 21, 2009).

## APPENDIX A: Regulations.Gov User Experience Journey

To illustrate how the deficiencies in the Regulations.Gov user experience, in combination, interfere with the public's reasonable ability to access e-docket content such as comments, this narrative considers the example of the e-docket for the Sunset Rule, an illegal rule issued by HHS during the lame-duck period of the Trump administration that is currently the subject of litigation filed by Democracy Forward.<sup>1</sup>

### **Simply finding the docket for the Sunset Rule is difficult because of the ineffective search function and lack of docket summaries.**

The Federal Register Notice for the Sunset Rule lists the docket number as HHS-OS-2020-0012.<sup>2</sup> A user would reasonably copy the docket number and enter it into the search bar on Regulations.Gov. The results inexplicably take the user to a list of documents (not dockets) from many agencies outside of HHS, with the Department of Transportation and the Environmental Protection Agency at the top of the list.<sup>3</sup> The left sidebar has an agency filter, but none show HHS, the agency that issued the rule, which is particularly surprising given that the agency abbreviation is right there in the docket number.<sup>4</sup>



<sup>1</sup> 86 Fed. Reg. 5,694; *County of Santa Clara v. U.S. Department of Health & Human Services*, No. 21-cv-1655 (N.D. Cal).

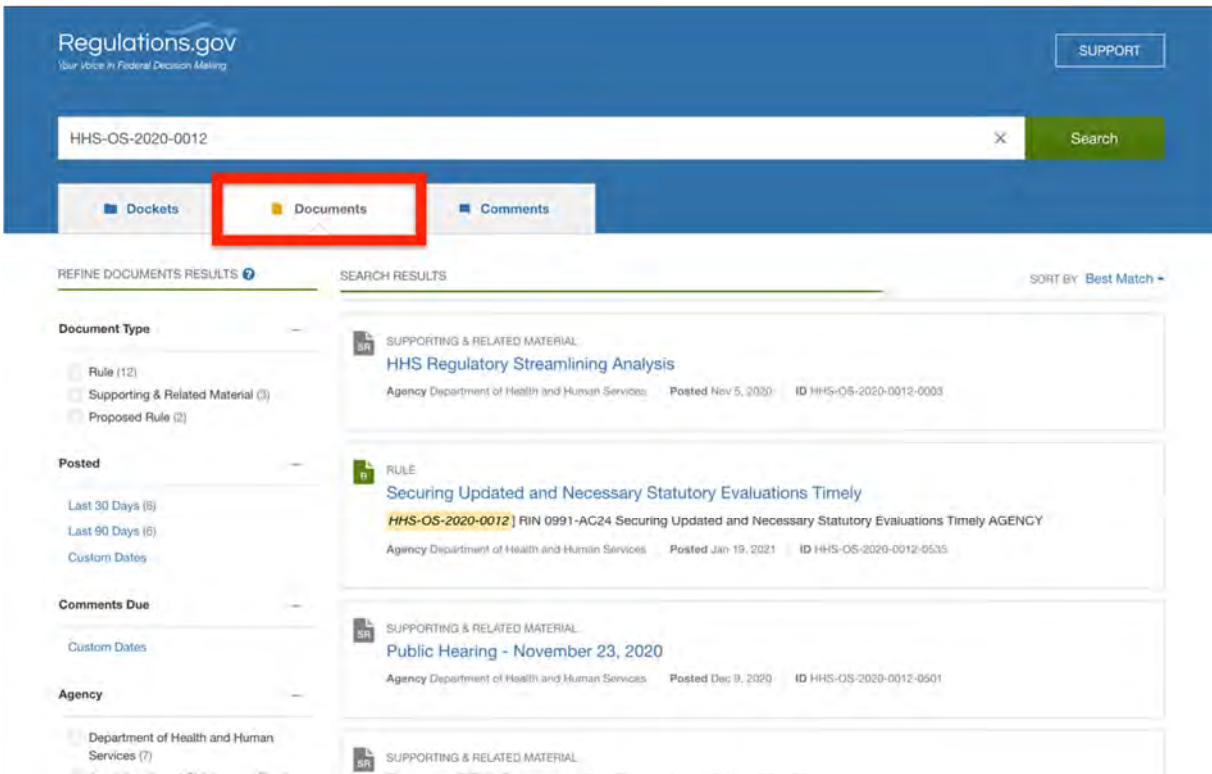
<sup>2</sup> 86 Fed. Reg. 5,694. Docket numbers generally begin with an agency identifier, here “HHS” for the Department of Health and Human Services.

<sup>3</sup> <https://www.regulations.gov/search?filter=HHS%E2%80%93OS%E2%80%932020%E2%80%930012>.

<sup>4</sup> *Id.*

A user might then click to the “docket” tab, but that tab shows only a “[n]o results” note.<sup>5</sup> 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.<sup>6</sup>

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.<sup>7</sup>



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.”<sup>8</sup> But, unlike the old version of Regulations.Gov, the docket page contains no docket summary,<sup>9</sup> 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.

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

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

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

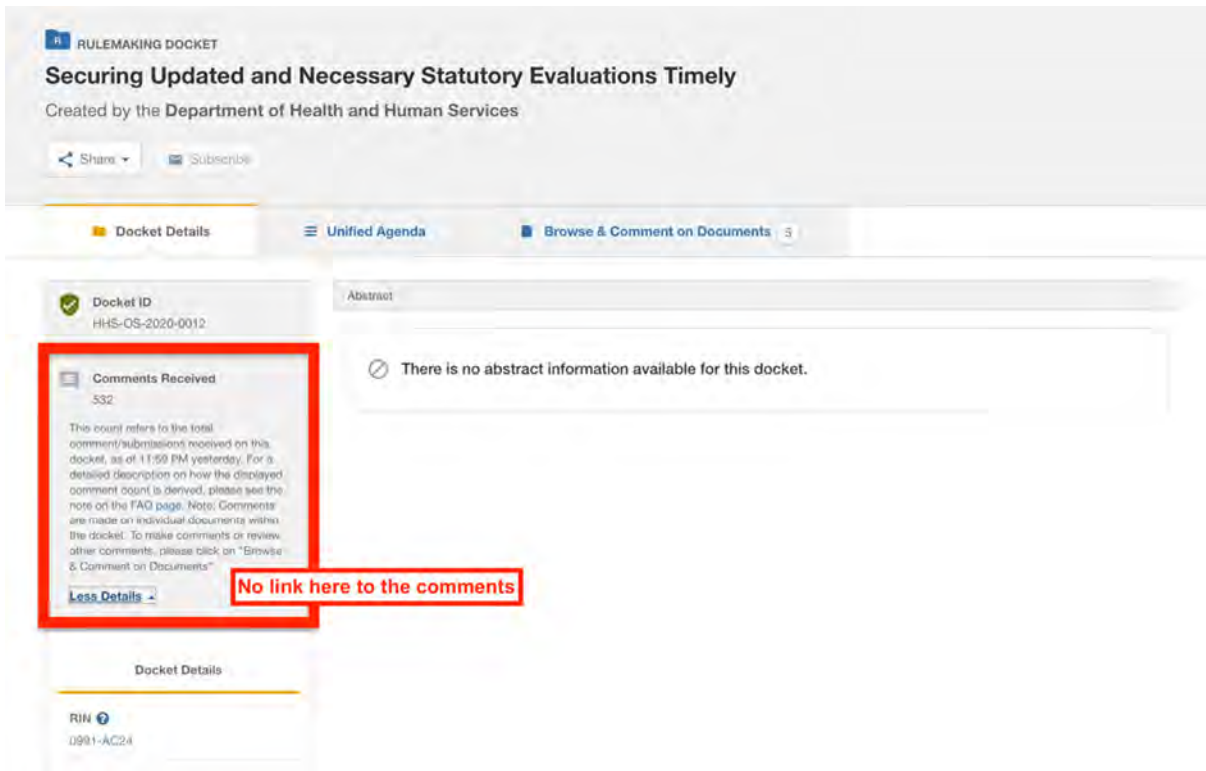
<sup>8</sup> <https://www.regulations.gov/search/docket?filter=HHS-OS-2020-0012>.

<sup>9</sup> <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.<sup>10</sup>



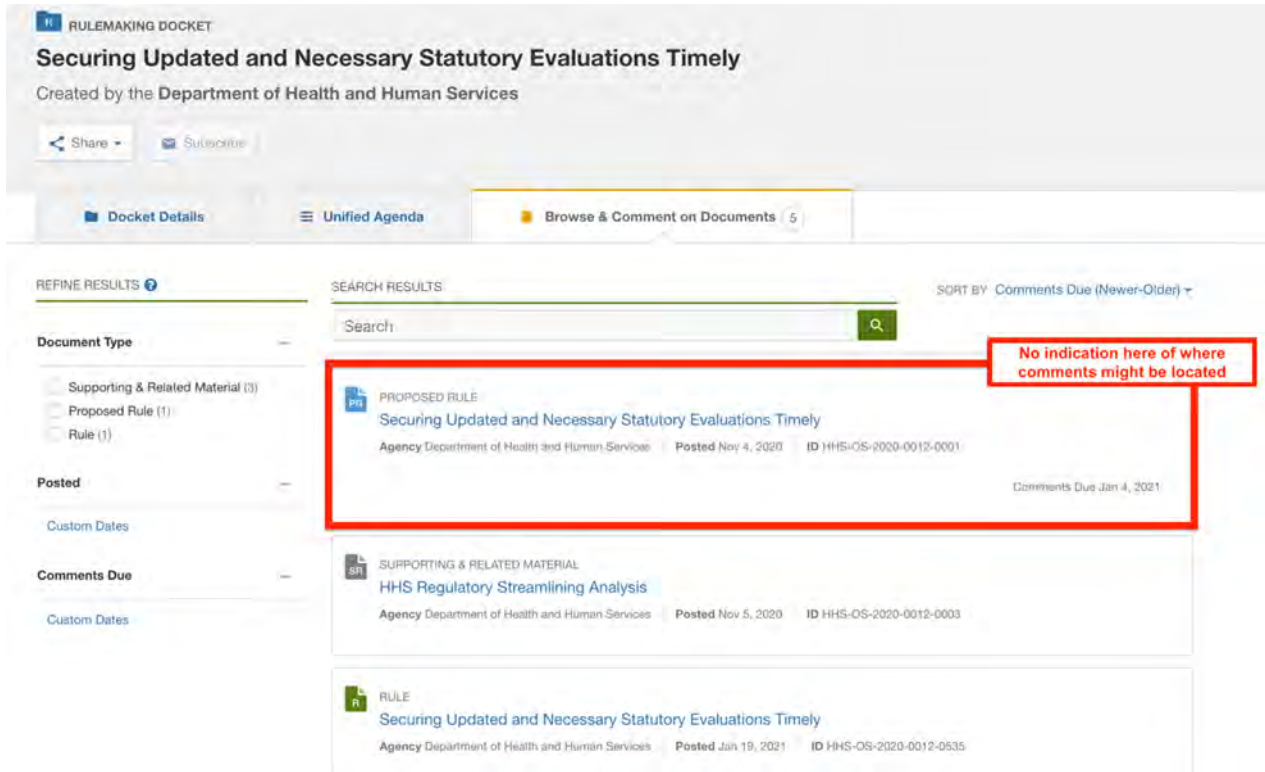
A user might click on the tab that says “Browse & Comment on Documents.” That tab leads to a list of five documents, none of which are comments.<sup>11</sup> A “document type” filter on the left lists three document types, but it includes no comment option.<sup>12</sup> The documents listed include no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

<sup>10</sup> *Id.*

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

<sup>12</sup> *Id.*

<sup>13</sup> *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.”<sup>14</sup> By clicking on that tab, one finally discovers a list of 530 comments.<sup>15</sup> 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.”<sup>16</sup> 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.<sup>17</sup>

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

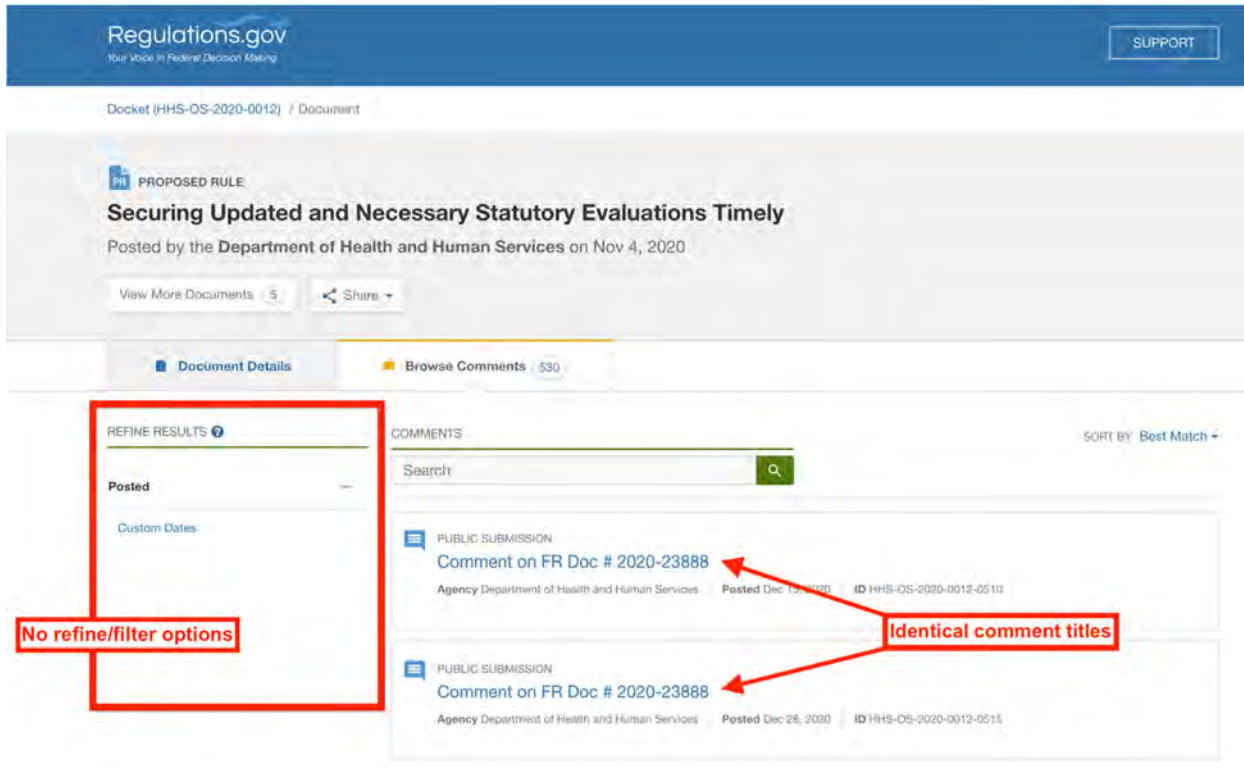
<sup>14</sup> <https://www.regulations.gov/document/HHS-OS-2020-0012-0001>.

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

<sup>16</sup> *Id.*

<sup>17</sup> *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.”<sup>18</sup>

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

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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.

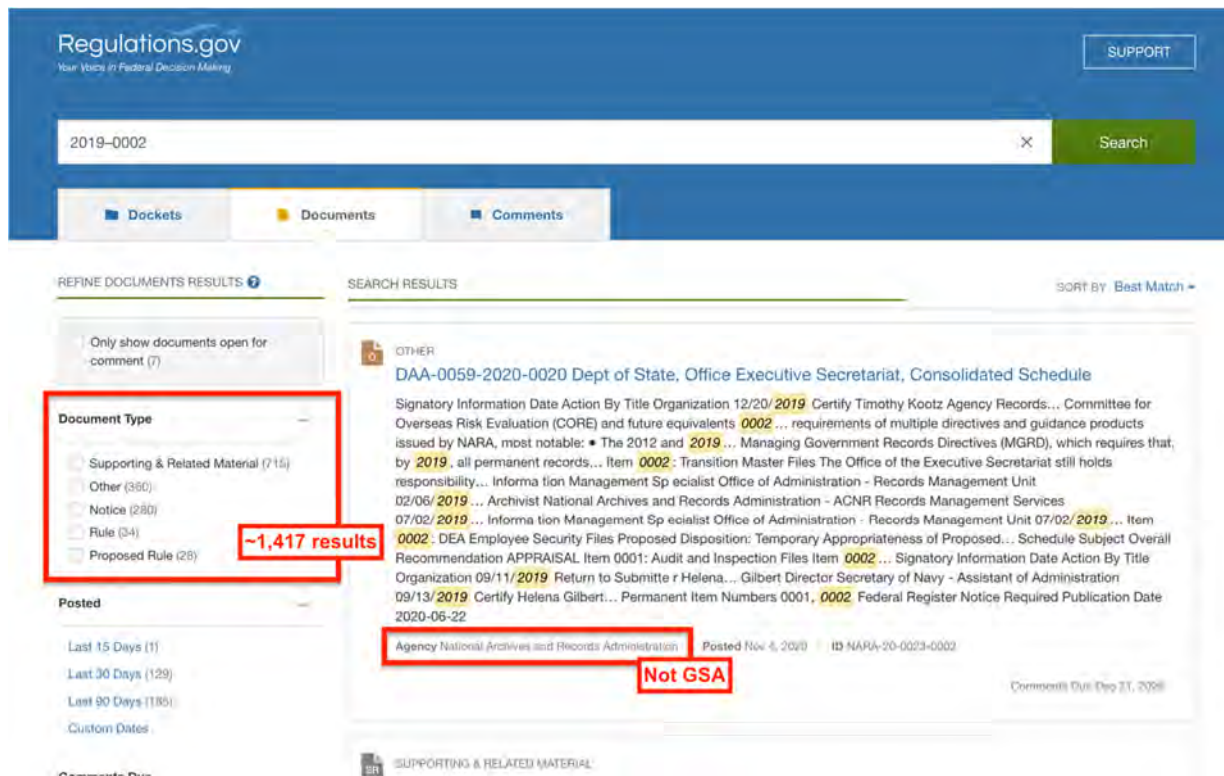
**The barrier to reviewing comments for the Sunset Rule is exacerbated because GSA has removed features that previously allowed users to sort comments for themselves.**

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.<sup>19</sup> 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.<sup>20</sup>



The Federal Register notice also has a name: Modernizing Services for Regulation Management.<sup>21</sup> 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.<sup>22</sup>

<sup>19</sup> 84 Fed. Reg. 72,364.

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

<sup>21</sup> 84 Fed. Reg. 72,364.

<sup>22</sup> <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.<sup>23</sup> 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.<sup>24</sup> 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).<sup>25</sup>

The screenshot displays a GSA notice page. At the top, it says "NOTICE" and "Meetings: Modernizing Services for Regulation Management", posted by the General Services Administration on Dec 31, 2019. Below this are options to "View More Documents" and "Share". A navigation bar contains "Document Details" and "Browse Comments 1". A red box highlights the "Browse Comments 1" tab, with a red callout box pointing to it that says "Comment here is not related to relevant GSA notice". The main content area is divided into sections: "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...), and "Dates" (The public meetings will be conducted on January 30 and March 25, 2020...).

<sup>23</sup> *Id.*

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

<sup>25</sup> <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).”<sup>26</sup>

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**  
99 (9-28242)

**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.

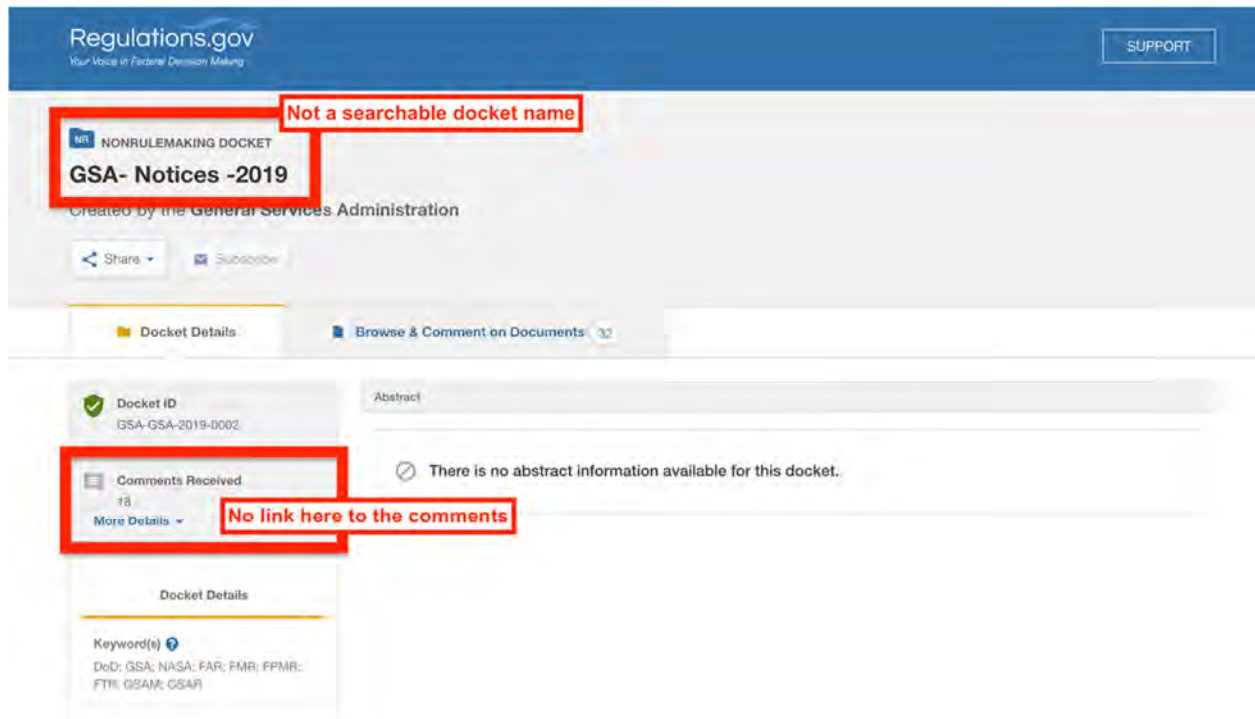
To further inform the public on issues affecting the future of Electronic Rulemaking Management, GSA is hosting two town-hall style public meetings. In addition to inviting members of the public to attend these meetings, GSA is seeking subject matter experts who would be interested in participating in 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**

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



This, finally, directs the user to a docket page.<sup>27</sup> 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.<sup>28</sup> A box on the left says “Comments Received 18,” but, again, like with the Sunset Rule docket, there is no link to the comments.<sup>29</sup>



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.”<sup>30</sup>

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

<sup>28</sup> *Id.*

<sup>29</sup> *Id.*

<sup>30</sup> <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  
**Not relevant** X

? 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  
**Not relevant** X

? 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  
**Not relevant** X

X 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  
**Not relevant**

Ultimately, after finding the correct page for this rulemaking docket,<sup>31</sup> 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.

<sup>31</sup> <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.<sup>1</sup> 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.<sup>2</sup>

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.<sup>3</sup> 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.”<sup>4</sup> Then, two weeks after that, he was informed with no explanation that his rate limit had been reverted to 1,000 calls per hour.<sup>5</sup> 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.”<sup>6</sup>

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

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<sup>1</sup> 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).

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

<sup>3</sup> Attachment D at 1 (email exchange with eRulemaking Program).

<sup>4</sup> *Id.* at 2.

<sup>5</sup> *Id.* at 5.

<sup>6</sup> *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”),<sup>7</sup> and the comments themselves have data in the fields for “Submitter Name” and “Organization Name.”<sup>8</sup> 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.<sup>9</sup> 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"<sup>10</sup>

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

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

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

<sup>10</sup> 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               | <a href="https://www.regulations.gov/document?D=PHMSA-2011-0023-0021">https://www.regulations.gov/document?D=PHMSA-2011-0023-0021</a> |
| Comment from Alessandro Demma                                                                           | PUBLIC SUBMISSIONS                          | 1                | Demma               | Alessandro           | A3 Monitoring                                                                        | PHMSA-2011-0023-0188 | Comment(s)        | pdf       | N/A             | <a href="https://www.regulations.gov/document?D=PHMSA-2011-0023-0188">https://www.regulations.gov/document?D=PHMSA-2011-0023-0188</a> |
| Accufacts Inc. - Comments                                                                               | PUBLIC SUBMISSIONS                          | 1                | Kuprewicz           | Richard              | Accufacts Inc.                                                                       | PHMSA-2011-0023-0073 | Comment(s)        | N/A       | 1               | <a href="https://www.regulations.gov/document?D=PHMSA-2011-0023-0073">https://www.regulations.gov/document?D=PHMSA-2011-0023-0073</a> |
| 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             | <a href="https://www.regulations.gov/document?D=PHMSA-2011-0023-0441">https://www.regulations.gov/document?D=PHMSA-2011-0023-0441</a> |
| Comment from Peg Conway                                                                                 | PUBLIC SUBMISSIONS                          | N/A              | Conway              | Peg                  | N/A                                                                                  | PHMSA-2011-0023-0257 | Comment(s)        | N/A       | N/A             | <a href="https://www.regulations.gov/document?D=PHMSA-2011-0023-0257">https://www.regulations.gov/document?D=PHMSA-2011-0023-0257</a> |
| Comment from Rick & Theresa Scholl                                                                      | PUBLIC SUBMISSIONS                          | 1                | Scholl              | Rick & Theresa       | N/A                                                                                  | PHMSA-2011-0023-0380 | Comment(s)        | N/A       | N/A             | <a href="https://www.regulations.gov/document?D=PHMSA-2011-0023-0380">https://www.regulations.gov/document?D=PHMSA-2011-0023-0380</a> |
| Comment from M. Sushore                                                                                 | PUBLIC SUBMISSIONS                          | N/A              | Sushore             | M.                   | N/A                                                                                  | PHMSA-2011-0023-0313 | Comment(s)        | N/A       | N/A             | <a href="https://www.regulations.gov/document?D=PHMSA-2011-0023-0313">https://www.regulations.gov/document?D=PHMSA-2011-0023-0313</a> |
| Comment from David Alleyne                                                                              | PUBLIC SUBMISSIONS                          | N/A              | Alleyne             | David                | N/A                                                                                  | PHMSA-2011-0023-0125 | Comment(s)        | N/A       | 1               | <a href="https://www.regulations.gov/document?D=PHMSA-2011-0023-0125">https://www.regulations.gov/document?D=PHMSA-2011-0023-0125</a> |
| Comment from North Dakota Petroleum Council                                                             | PUBLIC SUBMISSIONS                          | 1                | Cutting             | Kara                 | N/A                                                                                  | PHMSA-2011-0023-0432 | Comment(s)        | N/A       | N/A             | <a href="https://www.regulations.gov/document?D=PHMSA-2011-0023-0432">https://www.regulations.gov/document?D=PHMSA-2011-0023-0432</a> |
| 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             | <a href="https://www.regulations.gov/document?D=PHMSA-2011-0023-0439">https://www.regulations.gov/document?D=PHMSA-2011-0023-0439</a> |
| Air Products and Chemicals, Inc. - Comments                                                             | PUBLIC SUBMISSIONS                          | 1                | Gutacker            | Andrew               | Air Products and Chemicals, Inc.                                                     | PHMSA-2011-0023-0075 | Comment(s)        | pdf       | 1               | <a href="https://www.regulations.gov/document?D=PHMSA-2011-0023-0075">https://www.regulations.gov/document?D=PHMSA-2011-0023-0075</a> |
| Comment from Nancy Dawley                                                                               | PUBLIC SUBMISSIONS                          | N/A              | Dawley              | Nancy                | N/A                                                                                  | PHMSA-2011-0023-0198 | Comment(s)        | N/A       | N/A             | <a href="https://www.regulations.gov/document?D=PHMSA-2011-0023-0198">https://www.regulations.gov/document?D=PHMSA-2011-0023-0198</a> |
| Comment from Mary Friend                                                                                | PUBLIC SUBMISSIONS                          | 1                | Friend              | Mary                 | N/A                                                                                  | PHMSA-2011-0023-0320 | Comment(s)        | pdf       | N/A             | <a href="https://www.regulations.gov/document?D=PHMSA-2011-0023-0320">https://www.regulations.gov/document?D=PHMSA-2011-0023-0320</a> |
| Alaska Dept. of Natural Resources - Comment                                                             | PUBLIC SUBMISSIONS                          | 1                | Balash              | Joe                  | Alaska Dept. of Natural Resources                                                    | PHMSA-2011-0023-0016 | N/A               | pdf       | 0               | <a href="https://www.regulations.gov/document?D=PHMSA-2011-0023-0016">https://www.regulations.gov/document?D=PHMSA-2011-0023-0016</a> |
| Stephen and Tina Henning - Comments                                                                     | OTHER                                       | 1                | N/A                 | N/A                  | N/A                                                                                  | PHMSA-2011-0023-0106 | Acknowledgement   | N/A       | 1               | <a href="https://www.regulations.gov/document?D=PHMSA-2011-0023-0106">https://www.regulations.gov/document?D=PHMSA-2011-0023-0106</a> |
| John J. Tintera - Comment                                                                               | PUBLIC SUBMISSIONS                          | 1                | Tintera             | John                 | N/A                                                                                  | PHMSA-2011-0023-0015 | N/A               | N/A       | 0               | <a href="https://www.regulations.gov/document?D=PHMSA-2011-0023-0015">https://www.regulations.gov/document?D=PHMSA-2011-0023-0015</a> |
| Comment from David Eigel                                                                                | PUBLIC SUBMISSIONS                          | 1                | Eigel               | David                | N/A                                                                                  | PHMSA-2011-0023-0201 | Comment(s)        | docx      | N/A             | <a href="https://www.regulations.gov/document?D=PHMSA-2011-0023-0201">https://www.regulations.gov/document?D=PHMSA-2011-0023-0201</a> |
| Comment from Karen Cash                                                                                 | PUBLIC SUBMISSIONS                          | 1                | Cash                | Karen                | N/A                                                                                  | PHMSA-2011-0023-0222 | Comment(s)        | N/A       | N/A             | <a href="https://www.regulations.gov/document?D=PHMSA-2011-0023-0222">https://www.regulations.gov/document?D=PHMSA-2011-0023-0222</a> |
| Comment from John Dunne                                                                                 | PUBLIC SUBMISSIONS                          | 1                | Dunne               | John                 | N/A                                                                                  | PHMSA-2011-0023-0219 | Comment(s)        | N/A       | N/A             | <a href="https://www.regulations.gov/document?D=PHMSA-2011-0023-0219">https://www.regulations.gov/document?D=PHMSA-2011-0023-0219</a> |
| Comment from Thomas M Lael                                                                              | PUBLIC SUBMISSIONS                          | 1                | Lael                | Thomas M             | N/A                                                                                  | PHMSA-2011-0023-0208 | Comment(s)        | N/A       | N/A             | <a href="https://www.regulations.gov/document?D=PHMSA-2011-0023-0208">https://www.regulations.gov/document?D=PHMSA-2011-0023-0208</a> |
| Alliance Pipeline - Comment                                                                             | PUBLIC SUBMISSIONS                          | 1                | McGrath             | Michael              | Alliance Pipeline                                                                    | PHMSA-2011-0023-0047 | Comment(s)        | N/A       | 1               | <a href="https://www.regulations.gov/document?D=PHMSA-2011-0023-0047">https://www.regulations.gov/document?D=PHMSA-2011-0023-0047</a> |
| Comment from Monika Blazs                                                                               | PUBLIC SUBMISSIONS                          | N/A              | Blazs               | Monika               | N/A                                                                                  | PHMSA-2011-0023-0369 | Comment(s)        | N/A       | N/A             | <a href="https://www.regulations.gov/document?D=PHMSA-2011-0023-0369">https://www.regulations.gov/document?D=PHMSA-2011-0023-0369</a> |
| 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             | <a href="https://www.regulations.gov/document?D=PHMSA-2011-0023-0307">https://www.regulations.gov/document?D=PHMSA-2011-0023-0307</a> |
| American Gas Association - Comments                                                                     | PUBLIC SUBMISSIONS                          | 2                | Bennett             | Phillip              | American Gas Association                                                             | PHMSA-2011-0023-0086 | Comment(s)        | N/A       | 1               | <a href="https://www.regulations.gov/document?D=PHMSA-2011-0023-0086">https://www.regulations.gov/document?D=PHMSA-2011-0023-0086</a> |
| Comment from James O'Reilly                                                                             | PUBLIC SUBMISSIONS                          | N/A              | O'Reilly            | James                | N/A                                                                                  | PHMSA-2011-0023-0377 | Comment(s)        | N/A       | N/A             | <a href="https://www.regulations.gov/document?D=PHMSA-2011-0023-0377">https://www.regulations.gov/document?D=PHMSA-2011-0023-0377</a> |
| Comment from Anonymous                                                                                  | PUBLIC SUBMISSIONS                          | N/A              | Anonymous           | Anonymous            | N/A                                                                                  | PHMSA-2011-0023-0149 | Comment(s)        | N/A       | N/A             | <a href="https://www.regulations.gov/document?D=PHMSA-2011-0023-0149">https://www.regulations.gov/document?D=PHMSA-2011-0023-0149</a> |
| Comment from Harry Bennett                                                                              | PUBLIC SUBMISSIONS                          | N/A              | Bennett             | Harry                | N/A                                                                                  | PHMSA-2011-0023-0286 | Comment(s)        | N/A       | N/A             | <a href="https://www.regulations.gov/document?D=PHMSA-2011-0023-0286">https://www.regulations.gov/document?D=PHMSA-2011-0023-0286</a> |
| Comment from Erin Kurilla                                                                               | PUBLIC SUBMISSIONS                          | 1                | Kurilla             | Erin                 | American Gas Association                                                             | PHMSA-2011-0023-0340 | Comment(s)        | N/A       | N/A             | <a href="https://www.regulations.gov/document?D=PHMSA-2011-0023-0340">https://www.regulations.gov/document?D=PHMSA-2011-0023-0340</a> |
| 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               | <a href="https://www.regulations.gov/document?D=PHMSA-2011-0023-0008">https://www.regulations.gov/document?D=PHMSA-2011-0023-0008</a> |
| Comment from Jesse Martus                                                                               | PUBLIC SUBMISSIONS                          | N/A              | Martus              | Jesse                | N/A                                                                                  | PHMSA-2011-0023-0434 | Comment(s)        | N/A       | N/A             | <a href="https://www.regulations.gov/document?D=PHMSA-2011-0023-0434">https://www.regulations.gov/document?D=PHMSA-2011-0023-0434</a> |
| Comment from Eric Kozak                                                                                 | PUBLIC SUBMISSIONS                          | 1                | Kozak               | Eric                 | N/A                                                                                  | PHMSA-2011-0023-0314 | Comment(s)        | N/A       | N/A             | <a href="https://www.regulations.gov/document?D=PHMSA-2011-0023-0314">https://www.regulations.gov/document?D=PHMSA-2011-0023-0314</a> |
| Comment from Debby Christy                                                                              | PUBLIC SUBMISSIONS                          | 1                | Christy             | Debby                | N/A                                                                                  | PHMSA-2011-0023-0170 | Comment(s)        | N/A       | N/A             | <a href="https://www.regulations.gov/document?D=PHMSA-2011-0023-0170">https://www.regulations.gov/document?D=PHMSA-2011-0023-0170</a> |
| Richard and Alison Rupert - Comment                                                                     | PUBLIC SUBMISSIONS                          | N/A              | Rupert              | Richard and Alison   | N/A                                                                                  | PHMSA-2011-0023-0039 | Comment(s)        | N/A       | 1               | <a href="https://www.regulations.gov/document?D=PHMSA-2011-0023-0039">https://www.regulations.gov/document?D=PHMSA-2011-0023-0039</a> |
| TECO Peoples Gas - Comments                                                                             | PUBLIC SUBMISSIONS                          | 1                | Weidley             | Todd                 | N/A                                                                                  | PHMSA-2011-0023-0424 | Comment(s)        | pdf       | N/A             | <a href="https://www.regulations.gov/document?D=PHMSA-2011-0023-0424">https://www.regulations.gov/document?D=PHMSA-2011-0023-0424</a> |
| Michael and Noree Kolman - Comment                                                                      | PUBLIC SUBMISSIONS                          | 1                | N/A                 | N/A                  | N/A                                                                                  | PHMSA-2011-0023-0107 | Comment(s)        | N/A       | 1               | <a href="https://www.regulations.gov/document?D=PHMSA-2011-0023-0107">https://www.regulations.gov/document?D=PHMSA-2011-0023-0107</a> |
| Kansas Department of Health and Environment - Comments                                                  | PUBLIC SUBMISSIONS                          | 1                | Cochran             | Michael              | N/A                                                                                  | PHMSA-2011-0023-0012 | Comment(s)        | N/A       | 1               | <a href="https://www.regulations.gov/document?D=PHMSA-2011-0023-0012">https://www.regulations.gov/document?D=PHMSA-2011-0023-0012</a> |
| Comment from Paulette Page                                                                              | PUBLIC SUBMISSIONS                          | N/A              | Page                | Paulette             | N/A                                                                                  | PHMSA-2011-0023-0275 | Comment(s)        | N/A       | N/A             | <a href="https://www.regulations.gov/document?D=PHMSA-2011-0023-0275">https://www.regulations.gov/document?D=PHMSA-2011-0023-0275</a> |
| American Gas Association - Comments                                                                     | PUBLIC SUBMISSIONS                          | 2                | Bennett             | Philip               | American Gas Association                                                             | PHMSA-2011-0023-0087 | Comment(s)        | N/A       | 1               | <a href="https://www.regulations.gov/document?D=PHMSA-2011-0023-0087">https://www.regulations.gov/document?D=PHMSA-2011-0023-0087</a> |
| Comment from Tom Correll                                                                                | PUBLIC SUBMISSIONS                          | 1                | Correll             | Tom                  | N/A                                                                                  | PHMSA-2011-0023-0325 | Comment(s)        | N/A       | N/A             | <a href="https://www.regulations.gov/document?D=PHMSA-2011-0023-0325">https://www.regulations.gov/document?D=PHMSA-2011-0023-0325</a> |
| Meryl Solar - Comments                                                                                  | PUBLIC SUBMISSIONS                          | N/A              | Solar               | Meryl                | N/A                                                                                  | PHMSA-2011-0023-0093 | Comment(s)        | N/A       | 1               | <a href="https://www.regulations.gov/document?D=PHMSA-2011-0023-0093">https://www.regulations.gov/document?D=PHMSA-2011-0023-0093</a> |
| Comment from Stephen Clark                                                                              | PUBLIC SUBMISSIONS                          | 1                | Clark               | Stephen              | N/A                                                                                  | PHMSA-2011-0023-0358 | Comment(s)        | N/A       | N/A             | <a href="https://www.regulations.gov/document?D=PHMSA-2011-0023-0358">https://www.regulations.gov/document?D=PHMSA-2011-0023-0358</a> |
| Comment from Beverly Edwards                                                                            | PUBLIC SUBMISSIONS                          | N/A              | Edwards             | Beverly              | N/A                                                                                  | PHMSA-2011-0023-0243 | Comment(s)        | N/A       | N/A             | <a href="https://www.regulations.gov/document?D=PHMSA-2011-0023-0243">https://www.regulations.gov/document?D=PHMSA-2011-0023-0243</a> |



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



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

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|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------|-----|---|-----------------|-------------------|------------------------------------------------------|----------------------|-------------------|------|-----|---------------------------------------------------------------------------------------------------------------------------------------|
| Comment from David McGuire                                                                                                                                                          | PUBLIC SUBMISSIONS  |     | 1 | McGuire         | David             | N/A                                                  | PHMSA-2011-0023-0332 | Comment(s)        | pdf  | N/A | <a href="https://www.regulations.gov/document?D=PHMSA-2011-0023-0332">https://www.regulations.gov/document?D=PHMSA-2011-0023-0332</a> |
| Comment from Catherine Fowler                                                                                                                                                       | PUBLIC SUBMISSIONS  | N/A |   | Fowler          | Catherine         | N/A                                                  | PHMSA-2011-0023-0187 | Comment(s)        | N/A  | N/A | <a href="https://www.regulations.gov/document?D=PHMSA-2011-0023-0187">https://www.regulations.gov/document?D=PHMSA-2011-0023-0187</a> |
| Comment from Kyle Rohrig                                                                                                                                                            | PUBLIC SUBMISSIONS  | N/A |   | Rohrig          | Kyle              | N/A                                                  | PHMSA-2011-0023-0223 | Comment(s)        | N/A  | N/A | <a href="https://www.regulations.gov/document?D=PHMSA-2011-0023-0223">https://www.regulations.gov/document?D=PHMSA-2011-0023-0223</a> |
| Comment from Drew Martin                                                                                                                                                            | PUBLIC SUBMISSIONS  |     | 1 | Martin          | Drew              | N/A                                                  | PHMSA-2011-0023-0282 | Comment(s)        | N/A  | N/A | <a href="https://www.regulations.gov/document?D=PHMSA-2011-0023-0282">https://www.regulations.gov/document?D=PHMSA-2011-0023-0282</a> |
| Comment from Denise Furey                                                                                                                                                           | PUBLIC SUBMISSIONS  | N/A |   | Furey           | Denise            | N/A                                                  | PHMSA-2011-0023-0277 | Comment(s)        | N/A  | N/A | <a href="https://www.regulations.gov/document?D=PHMSA-2011-0023-0277">https://www.regulations.gov/document?D=PHMSA-2011-0023-0277</a> |
| Comment from James Melia                                                                                                                                                            | PUBLIC SUBMISSIONS  |     | 1 | Melia           | James             | N/A                                                  | PHMSA-2011-0023-0210 | Comment(s)        | N/A  | N/A | <a href="https://www.regulations.gov/document?D=PHMSA-2011-0023-0210">https://www.regulations.gov/document?D=PHMSA-2011-0023-0210</a> |
| William F. Wissemann - Comments                                                                                                                                                     | PUBLIC SUBMISSIONS  |     | 1 | Wissemann       | William           | N/A                                                  | PHMSA-2011-0023-0011 | Comment(s)        | N/A  | 4   | <a href="https://www.regulations.gov/document?D=PHMSA-2011-0023-0011">https://www.regulations.gov/document?D=PHMSA-2011-0023-0011</a> |
| Comment from Janet Graber                                                                                                                                                           | PUBLIC SUBMISSIONS  | N/A |   | Graber          | Janet             | N/A                                                  | PHMSA-2011-0023-0392 | Comment(s)        | N/A  | N/A | <a href="https://www.regulations.gov/document?D=PHMSA-2011-0023-0392">https://www.regulations.gov/document?D=PHMSA-2011-0023-0392</a> |
| Comment from Doug McLinko                                                                                                                                                           | PUBLIC SUBMISSIONS  | N/A |   | McLinko         | Doug              | N/A                                                  | PHMSA-2011-0023-0209 | Comment(s)        | N/A  | N/A | <a href="https://www.regulations.gov/document?D=PHMSA-2011-0023-0209">https://www.regulations.gov/document?D=PHMSA-2011-0023-0209</a> |
| Comment from Anne Germain                                                                                                                                                           | PUBLIC SUBMISSIONS  |     | 1 | Germain         | Anne              | N/A                                                  | PHMSA-2011-0023-0143 | Comment(s)        | N/A  | N/A | <a href="https://www.regulations.gov/document?D=PHMSA-2011-0023-0143">https://www.regulations.gov/document?D=PHMSA-2011-0023-0143</a> |
| Comment from Mike Kirkwood                                                                                                                                                          | PUBLIC SUBMISSIONS  |     | 1 | Kirkwood        | Mike              | N/A                                                  | PHMSA-2011-0023-0252 | Comment(s)        | N/A  | N/A | <a href="https://www.regulations.gov/document?D=PHMSA-2011-0023-0252">https://www.regulations.gov/document?D=PHMSA-2011-0023-0252</a> |
| Comment from Helena Rhim                                                                                                                                                            | PUBLIC SUBMISSIONS  |     | 1 | Rhim            | Helena            | N/A                                                  | PHMSA-2011-0023-0319 | Comment(s)        | N/A  | N/A | <a href="https://www.regulations.gov/document?D=PHMSA-2011-0023-0319">https://www.regulations.gov/document?D=PHMSA-2011-0023-0319</a> |
| Gas Piping Technology Committee - Comment                                                                                                                                           | PUBLIC SUBMISSIONS  |     | 1 | Cabot           | Paul              | Gas Piping Technology Committee                      | PHMSA-2011-0023-0111 | Comment(s)        | N/A  | 1   | <a href="https://www.regulations.gov/document?D=PHMSA-2011-0023-0111">https://www.regulations.gov/document?D=PHMSA-2011-0023-0111</a> |
| Comment from E Kamine                                                                                                                                                               | PUBLIC SUBMISSIONS  | N/A |   | Kamine          | E                 | N/A                                                  | PHMSA-2011-0023-0393 | Comment(s)        | N/A  | N/A | <a href="https://www.regulations.gov/document?D=PHMSA-2011-0023-0393">https://www.regulations.gov/document?D=PHMSA-2011-0023-0393</a> |
| Comment from Michael Bellman                                                                                                                                                        | PUBLIC SUBMISSIONS  |     | 1 | Bellman         | Michael           | Gas Piping Technology Committee (GPTC)               | PHMSA-2011-0023-0303 | Comment(s)        | N/A  | N/A | <a href="https://www.regulations.gov/document?D=PHMSA-2011-0023-0303">https://www.regulations.gov/document?D=PHMSA-2011-0023-0303</a> |
| Comment from Richard Lonn                                                                                                                                                           | PUBLIC SUBMISSIONS  |     | 1 | Lonn            | Richard           | N/A                                                  | PHMSA-2011-0023-0345 | Comment(s)        | N/A  | N/A | <a href="https://www.regulations.gov/document?D=PHMSA-2011-0023-0345">https://www.regulations.gov/document?D=PHMSA-2011-0023-0345</a> |
| Gas Processors Association - Comments                                                                                                                                               | PUBLIC SUBMISSIONS  |     | 1 | Applekamp       | Jeff              | Gas Processors Association                           | PHMSA-2011-0023-0080 | Comment(s)        | N/A  | 1   | <a href="https://www.regulations.gov/document?D=PHMSA-2011-0023-0080">https://www.regulations.gov/document?D=PHMSA-2011-0023-0080</a> |
| Comment from GE Oil & Gas                                                                                                                                                           | PUBLIC SUBMISSIONS  |     | 1 | Hedren          | Patrick           | General Electric                                     | PHMSA-2011-0023-0151 | Comment(s)        | N/A  | N/A | <a href="https://www.regulations.gov/document?D=PHMSA-2011-0023-0151">https://www.regulations.gov/document?D=PHMSA-2011-0023-0151</a> |
| 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   | <a href="https://www.regulations.gov/document?D=PHMSA-2011-0023-0010">https://www.regulations.gov/document?D=PHMSA-2011-0023-0010</a> |
| Comment from Allen Drown                                                                                                                                                            | PUBLIC SUBMISSIONS  | N/A |   | Drown           | Allen             | N/A                                                  | PHMSA-2011-0023-0401 | Comment(s)        | N/A  | N/A | <a href="https://www.regulations.gov/document?D=PHMSA-2011-0023-0401">https://www.regulations.gov/document?D=PHMSA-2011-0023-0401</a> |
| Comment from American Homeowner                                                                                                                                                     | PUBLIC SUBMISSIONS  | N/A |   | Homeowner       | American          | N/A                                                  | PHMSA-2011-0023-0180 | Comment(s)        | N/A  | N/A | <a href="https://www.regulations.gov/document?D=PHMSA-2011-0023-0180">https://www.regulations.gov/document?D=PHMSA-2011-0023-0180</a> |
| Comment from Rick Kivela                                                                                                                                                            | PUBLIC SUBMISSIONS  |     | 1 | Kivela          | Rick              | N/A                                                  | PHMSA-2011-0023-0378 | Comment(s)        | N/A  | N/A | <a href="https://www.regulations.gov/document?D=PHMSA-2011-0023-0378">https://www.regulations.gov/document?D=PHMSA-2011-0023-0378</a> |
| 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 | <a href="https://www.regulations.gov/document?D=PHMSA-2011-0023-0306">https://www.regulations.gov/document?D=PHMSA-2011-0023-0306</a> |
| Comment from Beth Roads                                                                                                                                                             | PUBLIC SUBMISSIONS  |     | 1 | Roads           | Beth              | Indiana Utility Regulatory Commission                | PHMSA-2011-0023-0295 | Comment(s)        | pdf  | N/A | <a href="https://www.regulations.gov/document?D=PHMSA-2011-0023-0295">https://www.regulations.gov/document?D=PHMSA-2011-0023-0295</a> |
| Comment from Ed Kacer                                                                                                                                                               | PUBLIC SUBMISSIONS  |     | 1 | Kacer           | Ed                | N/A                                                  | PHMSA-2011-0023-0366 | Comment(s)        | pdf  | N/A | <a href="https://www.regulations.gov/document?D=PHMSA-2011-0023-0366">https://www.regulations.gov/document?D=PHMSA-2011-0023-0366</a> |
| Comment from Paul Cicio                                                                                                                                                             | PUBLIC SUBMISSIONS  |     | 1 | Cicio           | Paul              | Industrial Energy Consumers of America               | PHMSA-2011-0023-0224 | Comment(s)        | N/A  | N/A | <a href="https://www.regulations.gov/document?D=PHMSA-2011-0023-0224">https://www.regulations.gov/document?D=PHMSA-2011-0023-0224</a> |
| Comment from Farris Berry                                                                                                                                                           | PUBLIC SUBMISSIONS  |     | 1 | Berry           | Farris            | N/A                                                  | PHMSA-2011-0023-0309 | Comment(s)        | N/A  | N/A | <a href="https://www.regulations.gov/document?D=PHMSA-2011-0023-0309">https://www.regulations.gov/document?D=PHMSA-2011-0023-0309</a> |
| Comment from Tyler Gray                                                                                                                                                             | PUBLIC SUBMISSIONS  |     | 1 | Gray            | Tyler             | N/A                                                  | PHMSA-2011-0023-0416 | Comment(s)        | N/A  | N/A | <a href="https://www.regulations.gov/document?D=PHMSA-2011-0023-0416">https://www.regulations.gov/document?D=PHMSA-2011-0023-0416</a> |
| Comment from Paul Cicio                                                                                                                                                             | PUBLIC SUBMISSIONS  |     | 1 | Cicio           | Paul              | Industrial Energy Consumers of America               | PHMSA-2011-0023-0258 | Comment(s)        | N/A  | N/A | <a href="https://www.regulations.gov/document?D=PHMSA-2011-0023-0258">https://www.regulations.gov/document?D=PHMSA-2011-0023-0258</a> |
| 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 | <a href="https://www.regulations.gov/document?D=PHMSA-2011-0023-0440">https://www.regulations.gov/document?D=PHMSA-2011-0023-0440</a> |
| 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 | <a href="https://www.regulations.gov/document?D=PHMSA-2011-0023-0118">https://www.regulations.gov/document?D=PHMSA-2011-0023-0118</a> |
| Interstate Natural Gas Association of America - Comment                                                                                                                             | PUBLIC SUBMISSIONS  |     | 2 | Boss            | Terry             | INGAA                                                | PHMSA-2011-0023-0006 | N/A               | N/A  | 0   | <a href="https://www.regulations.gov/document?D=PHMSA-2011-0023-0006">https://www.regulations.gov/document?D=PHMSA-2011-0023-0006</a> |
| 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 | <a href="https://www.regulations.gov/document?D=PHMSA-2011-0023-0280">https://www.regulations.gov/document?D=PHMSA-2011-0023-0280</a> |
| 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   | <a href="https://www.regulations.gov/document?D=PHMSA-2011-0023-0002">https://www.regulations.gov/document?D=PHMSA-2011-0023-0002</a> |
| 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   | <a href="https://www.regulations.gov/document?D=PHMSA-2011-0023-0113">https://www.regulations.gov/document?D=PHMSA-2011-0023-0113</a> |
| 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 | <a href="https://www.regulations.gov/document?D=PHMSA-2011-0023-0354">https://www.regulations.gov/document?D=PHMSA-2011-0023-0354</a> |
| Comment from Glen Fridenstine                                                                                                                                                       | PUBLIC SUBMISSIONS  | N/A |   | Fridenstine     | Glen              | N/A                                                  | PHMSA-2011-0023-0194 | Comment(s)        | N/A  | N/A | <a href="https://www.regulations.gov/document?D=PHMSA-2011-0023-0194">https://www.regulations.gov/document?D=PHMSA-2011-0023-0194</a> |
| 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   | <a href="https://www.regulations.gov/document?D=PHMSA-2011-0023-0004">https://www.regulations.gov/document?D=PHMSA-2011-0023-0004</a> |
| Comment from Nick Lauren                                                                                                                                                            | PUBLIC SUBMISSIONS  | N/A |   | Lauren          | Nick              | N/A                                                  | PHMSA-2011-0023-0183 | Comment(s)        | N/A  | N/A | <a href="https://www.regulations.gov/document?D=PHMSA-2011-0023-0183">https://www.regulations.gov/document?D=PHMSA-2011-0023-0183</a> |
| Bob Beaumier - Comment                                                                                                                                                              | PUBLIC SUBMISSIONS  |     | 1 | Beaumier        | Bob               | N/A                                                  | PHMSA-2011-0023-0110 | Comment(s)        | N/A  | 1   | <a href="https://www.regulations.gov/document?D=PHMSA-2011-0023-0110">https://www.regulations.gov/document?D=PHMSA-2011-0023-0110</a> |
| Comment from Grace dela Rosa                                                                                                                                                        | PUBLIC SUBMISSIONS  |     | 1 | dela Rosa       | Grace             | N/A                                                  | PHMSA-2011-0023-0382 | Comment(s)        | pdf  | N/A | <a href="https://www.regulations.gov/document?D=PHMSA-2011-0023-0382">https://www.regulations.gov/document?D=PHMSA-2011-0023-0382</a> |
| Interstate Oil and Gas Compact Commission - Comment                                                                                                                                 | PUBLIC SUBMISSIONS  |     | 1 | Smith           | Carl              | N/A                                                  | PHMSA-2011-0023-0023 | Comment(s)        | N/A  | 1   | <a href="https://www.regulations.gov/document?D=PHMSA-2011-0023-0023">https://www.regulations.gov/document?D=PHMSA-2011-0023-0023</a> |



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|-------------------------------------------------------------------------------|--------------------|-----|---------------------|------------|---------------------------------------------------------|----------------------|-------------------------------|------|-----|---------------------------------------------------------------------------------------------------------------------------------------|
| 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   | <a href="https://www.regulations.gov/document?D=PHMSA-2011-0023-0082">https://www.regulations.gov/document?D=PHMSA-2011-0023-0082</a> |
| Comment from David Werner                                                     | PUBLIC SUBMISSIONS | N/A | Werner              | David      | N/A                                                     | PHMSA-2011-0023-0186 | Comment(s)                    | N/A  | N/A | <a href="https://www.regulations.gov/document?D=PHMSA-2011-0023-0186">https://www.regulations.gov/document?D=PHMSA-2011-0023-0186</a> |
| National Grid's - Comment                                                     | PUBLIC SUBMISSIONS | 1   | Shapiro             | Arthur     | N/A                                                     | PHMSA-2011-0023-0028 | Comment(s)                    | N/A  | 1   | <a href="https://www.regulations.gov/document?D=PHMSA-2011-0023-0028">https://www.regulations.gov/document?D=PHMSA-2011-0023-0028</a> |
| Comment from Talmadge Centers                                                 | PUBLIC SUBMISSIONS | 1   | Centers             | Talmadge   | N/A                                                     | PHMSA-2011-0023-0346 | Comment(s)                    | N/A  | N/A | <a href="https://www.regulations.gov/document?D=PHMSA-2011-0023-0346">https://www.regulations.gov/document?D=PHMSA-2011-0023-0346</a> |
| 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   | <a href="https://www.regulations.gov/document?D=PHMSA-2011-0023-0049">https://www.regulations.gov/document?D=PHMSA-2011-0023-0049</a> |
| Comment from Ethan Boger                                                      | PUBLIC SUBMISSIONS | N/A | Boger               | Ethan      | N/A                                                     | PHMSA-2011-0023-0273 | Comment(s)                    | N/A  | N/A | <a href="https://www.regulations.gov/document?D=PHMSA-2011-0023-0273">https://www.regulations.gov/document?D=PHMSA-2011-0023-0273</a> |
| Comment from Anonymous Anonymous                                              | PUBLIC SUBMISSIONS | 1   | Anonymous           | Anonymous  | Anonymous                                               | PHMSA-2011-0023-0418 | Comment(s)                    | pdf  | N/A | <a href="https://www.regulations.gov/document?D=PHMSA-2011-0023-0418">https://www.regulations.gov/document?D=PHMSA-2011-0023-0418</a> |
| Joseph J.H. Humphrey - Comments                                               | PUBLIC SUBMISSIONS | N/A | Humphrey            | Joseph     | Joseph Humphrey &                                       | PHMSA-2011-0023-0070 | Comment(s)                    | N/A  | 1   | <a href="https://www.regulations.gov/document?D=PHMSA-2011-0023-0070">https://www.regulations.gov/document?D=PHMSA-2011-0023-0070</a> |
| Comment from Kathryn Aldrich                                                  | PUBLIC SUBMISSIONS | N/A | Aldrich             | Kathryn    | N/A                                                     | PHMSA-2011-0023-0227 | Comment(s)                    | N/A  | N/A | <a href="https://www.regulations.gov/document?D=PHMSA-2011-0023-0227">https://www.regulations.gov/document?D=PHMSA-2011-0023-0227</a> |
| Comment from Donald Houston                                                   | PUBLIC SUBMISSIONS | N/A | Houston             | Donald     | N/A                                                     | PHMSA-2011-0023-0239 | Comment(s)                    | N/A  | N/A | <a href="https://www.regulations.gov/document?D=PHMSA-2011-0023-0239">https://www.regulations.gov/document?D=PHMSA-2011-0023-0239</a> |
| Comment from Cherie Baker                                                     | PUBLIC SUBMISSIONS | N/A | Baker               | Cherie     | N/A                                                     | PHMSA-2011-0023-0174 | Comment(s)                    | N/A  | N/A | <a href="https://www.regulations.gov/document?D=PHMSA-2011-0023-0174">https://www.regulations.gov/document?D=PHMSA-2011-0023-0174</a> |
| Richard A. Ide - Comment                                                      | PUBLIC SUBMISSIONS | 1   | Ide                 | Richard    | N/A                                                     | PHMSA-2011-0023-0112 | Comment(s)                    | N/A  | 1   | <a href="https://www.regulations.gov/document?D=PHMSA-2011-0023-0112">https://www.regulations.gov/document?D=PHMSA-2011-0023-0112</a> |
| Comment from Michael Falk                                                     | PUBLIC SUBMISSIONS | 2   | Falk                | Michael    | N/A                                                     | PHMSA-2011-0023-0387 | Comment(s)                    | N/A  | N/A | <a href="https://www.regulations.gov/document?D=PHMSA-2011-0023-0387">https://www.regulations.gov/document?D=PHMSA-2011-0023-0387</a> |
| Eric McCabe - Comment                                                         | PUBLIC SUBMISSIONS | N/A | McCabe              | Eric       | N/A                                                     | PHMSA-2011-0023-0036 | Comment(s)                    | N/A  | 1   | <a href="https://www.regulations.gov/document?D=PHMSA-2011-0023-0036">https://www.regulations.gov/document?D=PHMSA-2011-0023-0036</a> |
| Comment from Gregory George                                                   | PUBLIC SUBMISSIONS | 1   | George              | Gregory    | N/A                                                     | PHMSA-2011-0023-0321 | Comment(s)                    | N/A  | N/A | <a href="https://www.regulations.gov/document?D=PHMSA-2011-0023-0321">https://www.regulations.gov/document?D=PHMSA-2011-0023-0321</a> |
| Comment from Chuck Harris                                                     | PUBLIC SUBMISSIONS | 1   | Harris              | Chuck      | N/A                                                     | PHMSA-2011-0023-0253 | Comment(s)                    | N/A  | N/A | <a href="https://www.regulations.gov/document?D=PHMSA-2011-0023-0253">https://www.regulations.gov/document?D=PHMSA-2011-0023-0253</a> |
| Comment from Frank Bennett                                                    | PUBLIC SUBMISSIONS | 1   | Bennett             | Frank      | N/A                                                     | PHMSA-2011-0023-0334 | Comment(s)                    | N/A  | N/A | <a href="https://www.regulations.gov/document?D=PHMSA-2011-0023-0334">https://www.regulations.gov/document?D=PHMSA-2011-0023-0334</a> |
| Comment from Jeff Millington                                                  | PUBLIC SUBMISSIONS | 1   | Millington          | Jeff       | N/A                                                     | PHMSA-2011-0023-0338 | Comment(s)                    | N/A  | N/A | <a href="https://www.regulations.gov/document?D=PHMSA-2011-0023-0338">https://www.regulations.gov/document?D=PHMSA-2011-0023-0338</a> |
| 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   | <a href="https://www.regulations.gov/document?D=PHMSA-2011-0023-0089">https://www.regulations.gov/document?D=PHMSA-2011-0023-0089</a> |
| Comment from Gary Buchler                                                     | PUBLIC SUBMISSIONS | 1   | Buchler             | Gary       | Kinder Morgan, Inc.                                     | PHMSA-2011-0023-0349 | Comment(s)                    | N/A  | N/A | <a href="https://www.regulations.gov/document?D=PHMSA-2011-0023-0349">https://www.regulations.gov/document?D=PHMSA-2011-0023-0349</a> |
| Comment from Jeffrey L. Maples                                                | PUBLIC SUBMISSIONS | 1   | Maples              | Jeffrey L. | N/A                                                     | PHMSA-2011-0023-0360 | Comment(s)                    | N/A  | N/A | <a href="https://www.regulations.gov/document?D=PHMSA-2011-0023-0360">https://www.regulations.gov/document?D=PHMSA-2011-0023-0360</a> |
| Southwest Gas Corporation - Request for Extension of Comment Period           | OTHER              | 1   | Schmitz             | Jerome T.  | N/A                                                     | PHMSA-2011-0023-0128 | Request                       | N/A  | 1   | <a href="https://www.regulations.gov/document?D=PHMSA-2011-0023-0128">https://www.regulations.gov/document?D=PHMSA-2011-0023-0128</a> |
| 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   | <a href="https://www.regulations.gov/document?D=PHMSA-2011-0023-0062">https://www.regulations.gov/document?D=PHMSA-2011-0023-0062</a> |
| Comment from Peter Clyde                                                      | PUBLIC SUBMISSIONS | 1   | Clyde               | Peter      | Louisville Gas & Electric                               | PHMSA-2011-0023-0308 | Comment(s)                    | N/A  | N/A | <a href="https://www.regulations.gov/document?D=PHMSA-2011-0023-0308">https://www.regulations.gov/document?D=PHMSA-2011-0023-0308</a> |
| Comment from Simon Normand                                                    | PUBLIC SUBMISSIONS | 1   | Normand             | Simon      | Massachusetts Materials Technologies, LLC               | PHMSA-2011-0023-0371 | Comment(s)                    | N/A  | N/A | <a href="https://www.regulations.gov/document?D=PHMSA-2011-0023-0371">https://www.regulations.gov/document?D=PHMSA-2011-0023-0371</a> |
| MidAmerican Energy Company - Comments                                         | PUBLIC SUBMISSIONS | 1   | Jared               | Robert     | MidAmerican Energy Company                              | PHMSA-2011-0023-0095 | Comment(s)                    | N/A  | 1   | <a href="https://www.regulations.gov/document?D=PHMSA-2011-0023-0095">https://www.regulations.gov/document?D=PHMSA-2011-0023-0095</a> |
| Comment from Frank Allison                                                    | PUBLIC SUBMISSIONS | N/A | Allison             | Frank      | N/A                                                     | PHMSA-2011-0023-0225 | Comment(s)                    | N/A  | N/A | <a href="https://www.regulations.gov/document?D=PHMSA-2011-0023-0225">https://www.regulations.gov/document?D=PHMSA-2011-0023-0225</a> |
| Comment from Heather Shelby                                                   | PUBLIC SUBMISSIONS | 1   | Shelby              | Heather    | N/A                                                     | PHMSA-2011-0023-0329 | Comment(s)                    | N/A  | N/A | <a href="https://www.regulations.gov/document?D=PHMSA-2011-0023-0329">https://www.regulations.gov/document?D=PHMSA-2011-0023-0329</a> |
| 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   | <a href="https://www.regulations.gov/document?D=PHMSA-2011-0023-0136">https://www.regulations.gov/document?D=PHMSA-2011-0023-0136</a> |
| Comment from Ezra Goldschmiedt                                                | PUBLIC SUBMISSIONS | N/A | Goldschmiedt        | Ezra       | N/A                                                     | PHMSA-2011-0023-0197 | Comment(s)                    | N/A  | N/A | <a href="https://www.regulations.gov/document?D=PHMSA-2011-0023-0197">https://www.regulations.gov/document?D=PHMSA-2011-0023-0197</a> |
| Comment from MidAmerican Energy Company                                       | PUBLIC SUBMISSIONS | 1   | Sullivan            | Connie     | MidAmerican Energy Company                              | PHMSA-2011-0023-0178 | Comment(s)                    | N/A  | N/A | <a href="https://www.regulations.gov/document?D=PHMSA-2011-0023-0178">https://www.regulations.gov/document?D=PHMSA-2011-0023-0178</a> |
| Elaine Lapp Esch - Comments                                                   | PUBLIC SUBMISSIONS | N/A | Esch                | Elaine     | N/A                                                     | PHMSA-2011-0023-0072 | Comment(s)                    | N/A  | 1   | <a href="https://www.regulations.gov/document?D=PHMSA-2011-0023-0072">https://www.regulations.gov/document?D=PHMSA-2011-0023-0072</a> |
| 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   | <a href="https://www.regulations.gov/document?D=PHMSA-2011-0023-0134">https://www.regulations.gov/document?D=PHMSA-2011-0023-0134</a> |
| Comment from Josephine Ferro                                                  | PUBLIC SUBMISSIONS | N/A | Ferro               | Josephine  | N/A                                                     | PHMSA-2011-0023-0211 | Comment(s)                    | N/A  | N/A | <a href="https://www.regulations.gov/document?D=PHMSA-2011-0023-0211">https://www.regulations.gov/document?D=PHMSA-2011-0023-0211</a> |
| 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 | <a href="https://www.regulations.gov/document?D=PHMSA-2011-0023-0216">https://www.regulations.gov/document?D=PHMSA-2011-0023-0216</a> |
| Comment from Amy Rosmarin                                                     | PUBLIC SUBMISSIONS | N/A | Rosmarin            | Amy        | N/A                                                     | PHMSA-2011-0023-0348 | Comment(s)                    | N/A  | N/A | <a href="https://www.regulations.gov/document?D=PHMSA-2011-0023-0348">https://www.regulations.gov/document?D=PHMSA-2011-0023-0348</a> |
| Comment from Pat Thon                                                         | PUBLIC SUBMISSIONS | N/A | Thon                | Pat        | N/A                                                     | PHMSA-2011-0023-0330 | Comment(s)                    | N/A  | N/A | <a href="https://www.regulations.gov/document?D=PHMSA-2011-0023-0330">https://www.regulations.gov/document?D=PHMSA-2011-0023-0330</a> |
| Comment from Richard Kuprewicz                                                | PUBLIC SUBMISSIONS | 1   | Kuprewicz           | Richard    | N/A                                                     | PHMSA-2011-0023-0300 | Comment(s)                    | N/A  | N/A | <a href="https://www.regulations.gov/document?D=PHMSA-2011-0023-0300">https://www.regulations.gov/document?D=PHMSA-2011-0023-0300</a> |
| NACE International - Comment                                                  | PUBLIC SUBMISSIONS | 1   | Moghissi, PhD.      | Oliver     | NACE International                                      | PHMSA-2011-0023-0024 | Comment(s)                    | N/A  | 1   | <a href="https://www.regulations.gov/document?D=PHMSA-2011-0023-0024">https://www.regulations.gov/document?D=PHMSA-2011-0023-0024</a> |
| 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   | <a href="https://www.regulations.gov/document?D=PHMSA-2011-0023-0122">https://www.regulations.gov/document?D=PHMSA-2011-0023-0122</a> |
| Comment from Debby Christy                                                    | PUBLIC SUBMISSIONS | 1   | Christy             | Debby      | N/A                                                     | PHMSA-2011-0023-0256 | Comment(s)                    | N/A  | N/A | <a href="https://www.regulations.gov/document?D=PHMSA-2011-0023-0256">https://www.regulations.gov/document?D=PHMSA-2011-0023-0256</a> |
| Comment from Chevron Corporation                                              | PUBLIC SUBMISSIONS | 1   | Corporation         | Chevron    | N/A                                                     | PHMSA-2011-0023-0264 | Comment(s)                    | N/A  | N/A | <a href="https://www.regulations.gov/document?D=PHMSA-2011-0023-0264">https://www.regulations.gov/document?D=PHMSA-2011-0023-0264</a> |
| Comment from Vern Meier (TransCanada)                                         | PUBLIC SUBMISSIONS | 1   | Meier (TransCanada) | Vern       | N/A                                                     | PHMSA-2011-0023-0379 | Comment(s)                    | N/A  | N/A | <a href="https://www.regulations.gov/document?D=PHMSA-2011-0023-0379">https://www.regulations.gov/document?D=PHMSA-2011-0023-0379</a> |
| Comment from Ethan Boger                                                      | PUBLIC SUBMISSIONS | N/A | Boger               | Ethan      | N/A                                                     | PHMSA-2011-0023-0268 | Comment(s)                    | N/A  | N/A | <a href="https://www.regulations.gov/document?D=PHMSA-2011-0023-0268">https://www.regulations.gov/document?D=PHMSA-2011-0023-0268</a> |
| 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   | <a href="https://www.regulations.gov/document?D=PHMSA-2011-0023-0053">https://www.regulations.gov/document?D=PHMSA-2011-0023-0053</a> |
| Comment from Caleb Laieski                                                    | PUBLIC SUBMISSIONS | N/A | Laieski             | Caleb      | N/A                                                     | PHMSA-2011-0023-0159 | Comment(s)                    | N/A  | N/A | <a href="https://www.regulations.gov/document?D=PHMSA-2011-0023-0159">https://www.regulations.gov/document?D=PHMSA-2011-0023-0159</a> |
| Comment from Daniel Delmonico                                                 | PUBLIC SUBMISSIONS | 1   | Delmonico           | Daniel     | N/A                                                     | PHMSA-2011-0023-0285 | Comment(s)                    | N/A  | N/A | <a href="https://www.regulations.gov/document?D=PHMSA-2011-0023-0285">https://www.regulations.gov/document?D=PHMSA-2011-0023-0285</a> |

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| Comment from Robert Gardner                                                                        | PUBLIC SUBMISSIONS |     | 1 | Gardner     | Robert           | N/A                                                             | PHMSA-2011-0023-0367 | Comment(s) | N/A  | N/A | <a href="https://www.regulations.gov/document?D=PHMSA-2011-0023-0367">https://www.regulations.gov/document?D=PHMSA-2011-0023-0367</a>   |
| Comment from Nancy Dollard                                                                         | PUBLIC SUBMISSIONS | N/A |   | Dollard     | Nancy            | N/A                                                             | PHMSA-2011-0023-0168 | Comment(s) | N/A  | N/A | <a href="https://www.regulations.gov/document?D=PHMSA-2011-0023-0168">https://www.regulations.gov/document?D=PHMSA-2011-0023-0168</a>   |
| The Iowa Utilities Board - Comment                                                                 | PUBLIC SUBMISSIONS |     | 1 | Stursma     | Donald           | N/A                                                             | PHMSA-2011-0023-0022 | Comment(s) | N/A  |     | 1 <a href="https://www.regulations.gov/document?D=PHMSA-2011-0023-0022">https://www.regulations.gov/document?D=PHMSA-2011-0023-0022</a> |
| Comment from Anonymous                                                                             | PUBLIC SUBMISSIONS | N/A |   | Anonymous   | Anonymous        | N/A                                                             | PHMSA-2011-0023-0200 | Comment(s) | N/A  | N/A | <a href="https://www.regulations.gov/document?D=PHMSA-2011-0023-0200">https://www.regulations.gov/document?D=PHMSA-2011-0023-0200</a>   |
| Comment from David Steffen                                                                         | PUBLIC SUBMISSIONS | N/A |   | Steffen     | David            | N/A                                                             | PHMSA-2011-0023-0207 | Comment(s) | N/A  | N/A | <a href="https://www.regulations.gov/document?D=PHMSA-2011-0023-0207">https://www.regulations.gov/document?D=PHMSA-2011-0023-0207</a>   |
| 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 <a href="https://www.regulations.gov/document?D=PHMSA-2011-0023-0119">https://www.regulations.gov/document?D=PHMSA-2011-0023-0119</a> |
| Anonymous                                                                                          | PUBLIC SUBMISSIONS | N/A |   | Anonymous   | Anonymous        | N/A                                                             | PHMSA-2011-0023-0176 | Comment(s) | N/A  | N/A | <a href="https://www.regulations.gov/document?D=PHMSA-2011-0023-0176">https://www.regulations.gov/document?D=PHMSA-2011-0023-0176</a>   |
| 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 | <a href="https://www.regulations.gov/document?D=PHMSA-2011-0023-0166">https://www.regulations.gov/document?D=PHMSA-2011-0023-0166</a>   |
| Comment from Diane Schmidt                                                                         | PUBLIC SUBMISSIONS | N/A |   | Schmidt     | Diane            | N/A                                                             | PHMSA-2011-0023-0202 | Comment(s) | N/A  | N/A | <a href="https://www.regulations.gov/document?D=PHMSA-2011-0023-0202">https://www.regulations.gov/document?D=PHMSA-2011-0023-0202</a>   |
| Comment from Cathy Loeb                                                                            | PUBLIC SUBMISSIONS | N/A |   | Loeb        | Cathy            | N/A                                                             | PHMSA-2011-0023-0355 | Comment(s) | N/A  | N/A | <a href="https://www.regulations.gov/document?D=PHMSA-2011-0023-0355">https://www.regulations.gov/document?D=PHMSA-2011-0023-0355</a>   |
| Ralph Kisberg - Comment                                                                            | PUBLIC SUBMISSIONS |     | 1 | Kisberg     | Ralph            | N/A                                                             | PHMSA-2011-0023-0102 | Comment(s) | N/A  |     | 1 <a href="https://www.regulations.gov/document?D=PHMSA-2011-0023-0102">https://www.regulations.gov/document?D=PHMSA-2011-0023-0102</a> |
| Comment from Jerome T Schmitz                                                                      | PUBLIC SUBMISSIONS |     | 1 | Schmitz     | Jerome T         | N/A                                                             | PHMSA-2011-0023-0356 | Comment(s) | N/A  | N/A | <a href="https://www.regulations.gov/document?D=PHMSA-2011-0023-0356">https://www.regulations.gov/document?D=PHMSA-2011-0023-0356</a>   |
| Sheila E. Lunger - Comments                                                                        | PUBLIC SUBMISSIONS | N/A |   | Lunger      | Sheila           | N/A                                                             | PHMSA-2011-0023-0050 | Comment(s) | N/A  |     | 1 <a href="https://www.regulations.gov/document?D=PHMSA-2011-0023-0050">https://www.regulations.gov/document?D=PHMSA-2011-0023-0050</a> |
| Comment from Robert Clarillos                                                                      | PUBLIC SUBMISSIONS |     | 1 | Clarillos   | Robert           | National Association of Pipeline Safety                         | PHMSA-2011-0023-0370 | Comment(s) | N/A  | N/A | <a href="https://www.regulations.gov/document?D=PHMSA-2011-0023-0370">https://www.regulations.gov/document?D=PHMSA-2011-0023-0370</a>   |
| 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 | <a href="https://www.regulations.gov/document?D=PHMSA-2011-0023-0292">https://www.regulations.gov/document?D=PHMSA-2011-0023-0292</a>   |
| Comment from Paul Stehura                                                                          | PUBLIC SUBMISSIONS | N/A |   | Stehura     | Paul             | N/A                                                             | PHMSA-2011-0023-0237 | Comment(s) | N/A  | N/A | <a href="https://www.regulations.gov/document?D=PHMSA-2011-0023-0237">https://www.regulations.gov/document?D=PHMSA-2011-0023-0237</a>   |
| Comment from Richard Baumgartner                                                                   | PUBLIC SUBMISSIONS | N/A |   | Baumgartner | Richard          | N/A                                                             | PHMSA-2011-0023-0172 | Comment(s) | N/A  | N/A | <a href="https://www.regulations.gov/document?D=PHMSA-2011-0023-0172">https://www.regulations.gov/document?D=PHMSA-2011-0023-0172</a>   |
| Comment from Melissa Marshall                                                                      | PUBLIC SUBMISSIONS |     | 1 | Marshall    | Melissa          | N/A                                                             | PHMSA-2011-0023-0365 | Comment(s) | N/A  | N/A | <a href="https://www.regulations.gov/document?D=PHMSA-2011-0023-0365">https://www.regulations.gov/document?D=PHMSA-2011-0023-0365</a>   |
| Comment from anonymous                                                                             | PUBLIC SUBMISSIONS | N/A |   | Anomn       | Anon             | N/A                                                             | PHMSA-2011-0023-0137 | Comment(s) | N/A  |     | 1 <a href="https://www.regulations.gov/document?D=PHMSA-2011-0023-0137">https://www.regulations.gov/document?D=PHMSA-2011-0023-0137</a> |
| Bob Beaumier - Comments                                                                            | PUBLIC SUBMISSIONS |     | 1 | Beaumier    | Bob              | N/A                                                             | PHMSA-2011-0023-0052 | Comment(s) | pdf  |     | 1 <a href="https://www.regulations.gov/document?D=PHMSA-2011-0023-0052">https://www.regulations.gov/document?D=PHMSA-2011-0023-0052</a> |
| Comment from Andrew Levron                                                                         | PUBLIC SUBMISSIONS | N/A |   | Levron      | Andrew           | N/A                                                             | PHMSA-2011-0023-0144 | Comment(s) | N/A  | N/A | <a href="https://www.regulations.gov/document?D=PHMSA-2011-0023-0144">https://www.regulations.gov/document?D=PHMSA-2011-0023-0144</a>   |
| 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 <a href="https://www.regulations.gov/document?D=PHMSA-2011-0023-0120">https://www.regulations.gov/document?D=PHMSA-2011-0023-0120</a> |
| Comment from MA Rohrer                                                                             | PUBLIC SUBMISSIONS | N/A |   | Rohrer      | MA               | N/A                                                             | PHMSA-2011-0023-0179 | Comment(s) | N/A  | N/A | <a href="https://www.regulations.gov/document?D=PHMSA-2011-0023-0179">https://www.regulations.gov/document?D=PHMSA-2011-0023-0179</a>   |
| 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 <a href="https://www.regulations.gov/document?D=PHMSA-2011-0023-0099">https://www.regulations.gov/document?D=PHMSA-2011-0023-0099</a> |
| 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 <a href="https://www.regulations.gov/document?D=PHMSA-2011-0023-0130">https://www.regulations.gov/document?D=PHMSA-2011-0023-0130</a> |
| Comment from Stephanie Watson                                                                      | PUBLIC SUBMISSIONS |     | 1 | Watson      | Stephanie        | N/A                                                             | PHMSA-2011-0023-0276 | Comment(s) | N/A  | N/A | <a href="https://www.regulations.gov/document?D=PHMSA-2011-0023-0276">https://www.regulations.gov/document?D=PHMSA-2011-0023-0276</a>   |
| Comments regarding Safety of Gas Transmission NPRM                                                 | PUBLIC SUBMISSIONS |     | 1 | Sheppard    | Brian            | N/A                                                             | PHMSA-2011-0023-0430 | Comment(s) | pdf  | N/A | <a href="https://www.regulations.gov/document?D=PHMSA-2011-0023-0430">https://www.regulations.gov/document?D=PHMSA-2011-0023-0430</a>   |
| Comment from Beth Esser                                                                            | PUBLIC SUBMISSIONS | N/A |   | Esser       | Beth             | N/A                                                             | PHMSA-2011-0023-0317 | Comment(s) | N/A  | N/A | <a href="https://www.regulations.gov/document?D=PHMSA-2011-0023-0317">https://www.regulations.gov/document?D=PHMSA-2011-0023-0317</a>   |
| ITT Exelis Geospatial Systems - Comment                                                            | PUBLIC SUBMISSIONS |     | 1 | Sloniker    | Rick             | N/A                                                             | PHMSA-2011-0023-0013 | Comment(s) | N/A  |     | 1 <a href="https://www.regulations.gov/document?D=PHMSA-2011-0023-0013">https://www.regulations.gov/document?D=PHMSA-2011-0023-0013</a> |
| Arthur A. Spapiro - Comment                                                                        | PUBLIC SUBMISSIONS | N/A |   | Shapiro     | Arthur           | National Grid                                                   | PHMSA-2011-0023-0104 | Comment(s) | N/A  |     | 1 <a href="https://www.regulations.gov/document?D=PHMSA-2011-0023-0104">https://www.regulations.gov/document?D=PHMSA-2011-0023-0104</a> |
| 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 <a href="https://www.regulations.gov/document?D=PHMSA-2011-0023-0090">https://www.regulations.gov/document?D=PHMSA-2011-0023-0090</a> |
| Comment from Paul Jackson                                                                          | PUBLIC SUBMISSIONS |     | 1 | Jackson     | Paul             | N/A                                                             | PHMSA-2011-0023-0132 | Comment(s) | N/A  |     | 1 <a href="https://www.regulations.gov/document?D=PHMSA-2011-0023-0132">https://www.regulations.gov/document?D=PHMSA-2011-0023-0132</a> |
| Comment from Allen Schuele                                                                         | PUBLIC SUBMISSIONS | N/A |   | Schuele     | Allen            | N/A                                                             | PHMSA-2011-0023-0126 | Comment(s) | N/A  |     | 1 <a href="https://www.regulations.gov/document?D=PHMSA-2011-0023-0126">https://www.regulations.gov/document?D=PHMSA-2011-0023-0126</a> |
| Comment from Laurel Gress                                                                          | PUBLIC SUBMISSIONS | N/A |   | Gress       | Laurel           | N/A                                                             | PHMSA-2011-0023-0167 | Comment(s) | N/A  | N/A | <a href="https://www.regulations.gov/document?D=PHMSA-2011-0023-0167">https://www.regulations.gov/document?D=PHMSA-2011-0023-0167</a>   |
| National Teransportation Safety Board - Comment                                                    | PUBLIC SUBMISSIONS |     | 1 | Hersman     | Deborah          | National Transportation Safety Board                            | PHMSA-2011-0023-0018 | Comment(s) | pdf  |     | 1 <a href="https://www.regulations.gov/document?D=PHMSA-2011-0023-0018">https://www.regulations.gov/document?D=PHMSA-2011-0023-0018</a> |
| Comment from Sandra Peters                                                                         | PUBLIC SUBMISSIONS |     | 1 | Peters      | Sandra           | N/A                                                             | PHMSA-2011-0023-0398 | Comment(s) | N/A  | N/A | <a href="https://www.regulations.gov/document?D=PHMSA-2011-0023-0398">https://www.regulations.gov/document?D=PHMSA-2011-0023-0398</a>   |
| 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 <a href="https://www.regulations.gov/document?D=PHMSA-2011-0023-0051">https://www.regulations.gov/document?D=PHMSA-2011-0023-0051</a> |
| Comment from Robert Gordon                                                                         | PUBLIC SUBMISSIONS | N/A |   | Gordon      | Robert           | N/A                                                             | PHMSA-2011-0023-0142 | Comment(s) | N/A  | N/A | <a href="https://www.regulations.gov/document?D=PHMSA-2011-0023-0142">https://www.regulations.gov/document?D=PHMSA-2011-0023-0142</a>   |
| Comment from Colleen Orsburn                                                                       | PUBLIC SUBMISSIONS | N/A |   | Orsburn     | Colleen          | N/A                                                             | PHMSA-2011-0023-0364 | Comment(s) | N/A  | N/A | <a href="https://www.regulations.gov/document?D=PHMSA-2011-0023-0364">https://www.regulations.gov/document?D=PHMSA-2011-0023-0364</a>   |
| Nicor Gas - Comments                                                                               | PUBLIC SUBMISSIONS |     | 1 | Quezada     | Leticia          | Nicor Gas                                                       | PHMSA-2011-0023-0078 | Comment(s) | N/A  |     | 1 <a href="https://www.regulations.gov/document?D=PHMSA-2011-0023-0078">https://www.regulations.gov/document?D=PHMSA-2011-0023-0078</a> |
| NiSource Gas Transmission & Storage - Comments                                                     | PUBLIC SUBMISSIONS |     | 1 | George      | Fredric          | NiSource Gas Transmission & Storage                             | PHMSA-2011-0023-0083 | Comment(s) | N/A  |     | 1 <a href="https://www.regulations.gov/document?D=PHMSA-2011-0023-0083">https://www.regulations.gov/document?D=PHMSA-2011-0023-0083</a> |
| Comment from Kenneth Christman                                                                     | PUBLIC SUBMISSIONS |     | 1 | Christman   | Kenneth          | NiSource Inc.                                                   | PHMSA-2011-0023-0255 | Comment(s) | docx | N/A | <a href="https://www.regulations.gov/document?D=PHMSA-2011-0023-0255">https://www.regulations.gov/document?D=PHMSA-2011-0023-0255</a>   |
| Northern Natural Gas - Comments                                                                    | PUBLIC SUBMISSIONS |     | 1 | Correll     | Thomas           | Northern Natural Gas                                            | PHMSA-2011-0023-0059 | Comment(s) | pdf  |     | 1 <a href="https://www.regulations.gov/document?D=PHMSA-2011-0023-0059">https://www.regulations.gov/document?D=PHMSA-2011-0023-0059</a> |
| Comment from Washington Gas Light Company                                                          | PUBLIC SUBMISSIONS |     | 1 | Parker      | Curtis           | N/A                                                             | PHMSA-2011-0023-0428 | Comment(s) | N/A  | N/A | <a href="https://www.regulations.gov/document?D=PHMSA-2011-0023-0428">https://www.regulations.gov/document?D=PHMSA-2011-0023-0428</a>   |
| Robert Cross - Comment                                                                             | PUBLIC SUBMISSIONS |     | 1 | Cross       | Robert           | N/A                                                             | PHMSA-2011-0023-0101 | Comment(s) | N/A  |     | 0 <a href="https://www.regulations.gov/document?D=PHMSA-2011-0023-0101">https://www.regulations.gov/document?D=PHMSA-2011-0023-0101</a> |
| 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 | <a href="https://www.regulations.gov/document?D=PHMSA-2011-0023-0196">https://www.regulations.gov/document?D=PHMSA-2011-0023-0196</a>   |
| Comment from Marilyn Learner                                                                       | PUBLIC SUBMISSIONS | N/A |   | Learner     | Marilyn          | N/A                                                             | PHMSA-2011-0023-0229 | Comment(s) | N/A  | N/A | <a href="https://www.regulations.gov/document?D=PHMSA-2011-0023-0229">https://www.regulations.gov/document?D=PHMSA-2011-0023-0229</a>   |



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

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



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

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|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------|-----|-----------|----------|---------------------------------------------|----------------------|-----------------|-----|-----|---------------------------------------------------------------------------------------------------------------------------------------|
| 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 (SUP | N/A | N/A | <a href="https://www.regulations.gov/document?D=PHMSA-2011-0023-0153">https://www.regulations.gov/document?D=PHMSA-2011-0023-0153</a> |
| Comment from Jonathan Strong                                                                                                                                                                                                                                                                            | PUBLIC SUBMISSIONS | 5   | Strong    | Jonathan | N/A                                         | PHMSA-2011-0023-0162 | Comment(s)      | N/A | N/A | <a href="https://www.regulations.gov/document?D=PHMSA-2011-0023-0162">https://www.regulations.gov/document?D=PHMSA-2011-0023-0162</a> |
| Comment from Robert Ehlers                                                                                                                                                                                                                                                                              | PUBLIC SUBMISSIONS | 1   | Ehlers    | Robert   | Valero Terminaling and Distribution Company | PHMSA-2011-0023-0335 | Comment(s)      | N/A | N/A | <a href="https://www.regulations.gov/document?D=PHMSA-2011-0023-0335">https://www.regulations.gov/document?D=PHMSA-2011-0023-0335</a> |
| Comment from Thomas Marlow                                                                                                                                                                                                                                                                              | PUBLIC SUBMISSIONS | 2   | Marlow    | Thomas   | Vectren Corporation                         | PHMSA-2011-0023-0287 | Comment(s)      | N/A | N/A | <a href="https://www.regulations.gov/document?D=PHMSA-2011-0023-0287">https://www.regulations.gov/document?D=PHMSA-2011-0023-0287</a> |
| Comment from Ian Landon                                                                                                                                                                                                                                                                                 | PUBLIC SUBMISSIONS | 1   | Landon    | Ian      | Virginia Oil and Gas                        | PHMSA-2011-0023-0289 | Comment(s)      | pdf | N/A | <a href="https://www.regulations.gov/document?D=PHMSA-2011-0023-0289">https://www.regulations.gov/document?D=PHMSA-2011-0023-0289</a> |
| 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 | <a href="https://www.regulations.gov/document?D=PHMSA-2011-0023-0426">https://www.regulations.gov/document?D=PHMSA-2011-0023-0426</a> |
| Marcellus Shale Coalition - Extension Request                                                                                                                                                                                                                                                           | OTHER              | 1   | N/A       | N/A      | N/A                                         | PHMSA-2011-0023-0135 | Acknowledgemen  | N/A | 1   | <a href="https://www.regulations.gov/document?D=PHMSA-2011-0023-0135">https://www.regulations.gov/document?D=PHMSA-2011-0023-0135</a> |
| Waste Management, Inc. - Comments                                                                                                                                                                                                                                                                       | PUBLIC SUBMISSIONS | 1   | Kelly     | Kerry    | Waste Management, Inc.                      | PHMSA-2011-0023-0094 | Comment(s)      | N/A | 1   | <a href="https://www.regulations.gov/document?D=PHMSA-2011-0023-0094">https://www.regulations.gov/document?D=PHMSA-2011-0023-0094</a> |
| Alaska Natural Gas Development Authority                                                                                                                                                                                                                                                                | PUBLIC SUBMISSIONS | 1   | Laughlin  | Kaye     | N/A                                         | PHMSA-2011-0023-0014 | Comment(s)      | pdf | 1   | <a href="https://www.regulations.gov/document?D=PHMSA-2011-0023-0014">https://www.regulations.gov/document?D=PHMSA-2011-0023-0014</a> |
| Comment from Robert Workman                                                                                                                                                                                                                                                                             | PUBLIC SUBMISSIONS | N/A | Workman   | Robert   | N/A                                         | PHMSA-2011-0023-0184 | Comment(s)      | N/A | N/A | <a href="https://www.regulations.gov/document?D=PHMSA-2011-0023-0184">https://www.regulations.gov/document?D=PHMSA-2011-0023-0184</a> |
| Comment from Rebecca Alwin                                                                                                                                                                                                                                                                              | PUBLIC SUBMISSIONS | N/A | Alwin     | Rebecca  | N/A                                         | PHMSA-2011-0023-0408 | Comment(s)      | N/A | N/A | <a href="https://www.regulations.gov/document?D=PHMSA-2011-0023-0408">https://www.regulations.gov/document?D=PHMSA-2011-0023-0408</a> |
| Comment from Glenn Rosen                                                                                                                                                                                                                                                                                | PUBLIC SUBMISSIONS | N/A | Rosen     | Glenn    | N/A                                         | PHMSA-2011-0023-0214 | Comment(s)      | N/A | N/A | <a href="https://www.regulations.gov/document?D=PHMSA-2011-0023-0214">https://www.regulations.gov/document?D=PHMSA-2011-0023-0214</a> |
| Williams Gas Pipeline - Comments                                                                                                                                                                                                                                                                        | PUBLIC SUBMISSIONS | 2   | Barnard   | Randy    | Williams Gas Pipeline                       | PHMSA-2011-0023-0098 | Comment(s)      | pdf | 1   | <a href="https://www.regulations.gov/document?D=PHMSA-2011-0023-0098">https://www.regulations.gov/document?D=PHMSA-2011-0023-0098</a> |
| State of Alaska - Comment                                                                                                                                                                                                                                                                               | PUBLIC SUBMISSIONS | 1   | Laughline | Kaye     | N/A                                         | PHMSA-2011-0023-0020 | Comment(s)      | pdf | 1   | <a href="https://www.regulations.gov/document?D=PHMSA-2011-0023-0020">https://www.regulations.gov/document?D=PHMSA-2011-0023-0020</a> |
| Comment from Roberta Winters                                                                                                                                                                                                                                                                            | PUBLIC SUBMISSIONS | N/A | Winters   | Roberta  | N/A                                         | PHMSA-2011-0023-0404 | Comment(s)      | N/A | N/A | <a href="https://www.regulations.gov/document?D=PHMSA-2011-0023-0404">https://www.regulations.gov/document?D=PHMSA-2011-0023-0404</a> |
| WKM Consultancy, LLC - Comment                                                                                                                                                                                                                                                                          | PUBLIC SUBMISSIONS | 1   | Muhlbauer | W. Kent  | WKM Consultancy, LLC                        | PHMSA-2011-0023-0026 | N/A             | N/A | 0   | <a href="https://www.regulations.gov/document?D=PHMSA-2011-0023-0026">https://www.regulations.gov/document?D=PHMSA-2011-0023-0026</a> |
| Comment from thomas west                                                                                                                                                                                                                                                                                | PUBLIC SUBMISSIONS | N/A | west      | thomas   | N/A                                         | PHMSA-2011-0023-0403 | Comment(s)      | N/A | N/A | <a href="https://www.regulations.gov/document?D=PHMSA-2011-0023-0403">https://www.regulations.gov/document?D=PHMSA-2011-0023-0403</a> |



## **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 columns and a balcony. The building is partially obscured by lush green trees in the foreground. A flagpole with a blue flag is visible on the right side of the building. The sky is blue with scattered white clouds.

# eRulemaking Update Office of Regulation Management

December 15, 2020

# Agenda - December 15, 2020

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**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

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**Dominic Mancini**

**Deputy Administrator**

**Office of Information and Regulatory Affairs**

**Office of Management and Budget**



**Jessica Salmoiraghi**

**Associate Administrator**

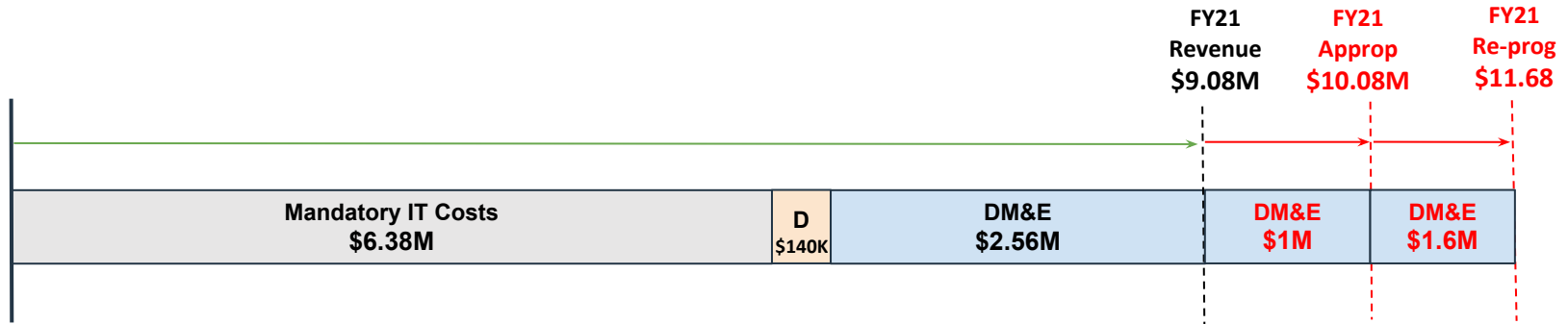
**Office of Government-wide Policy**

**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        |              |
|                         |              |
|                         |              |
|                         |              |

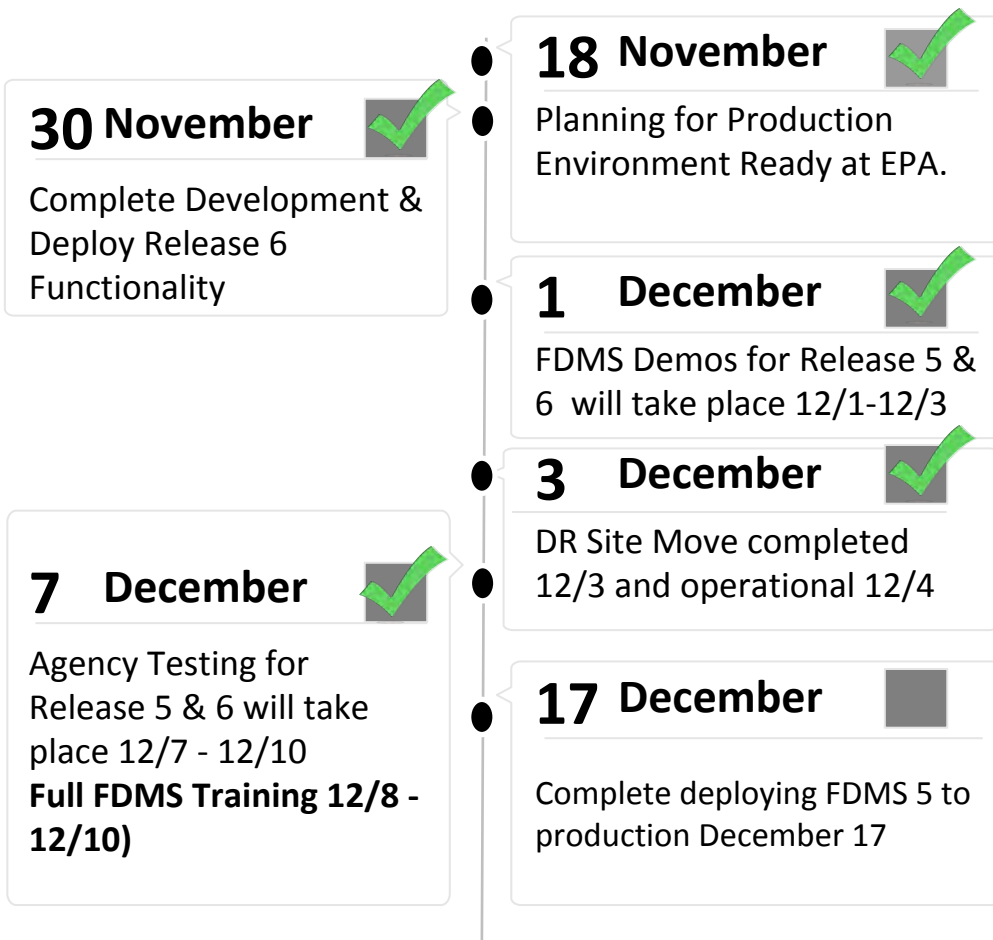
| \$1M Appropriation   |              |
|----------------------|--------------|
| Additional functions |              |
| FDMS                 | REGS         |
| Bulk Import          | Comment API  |
| Work Queue           | Beta Cutover |
| Dedup workaround     |              |
| Cross-agency accts   |              |
| 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](mailto: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:

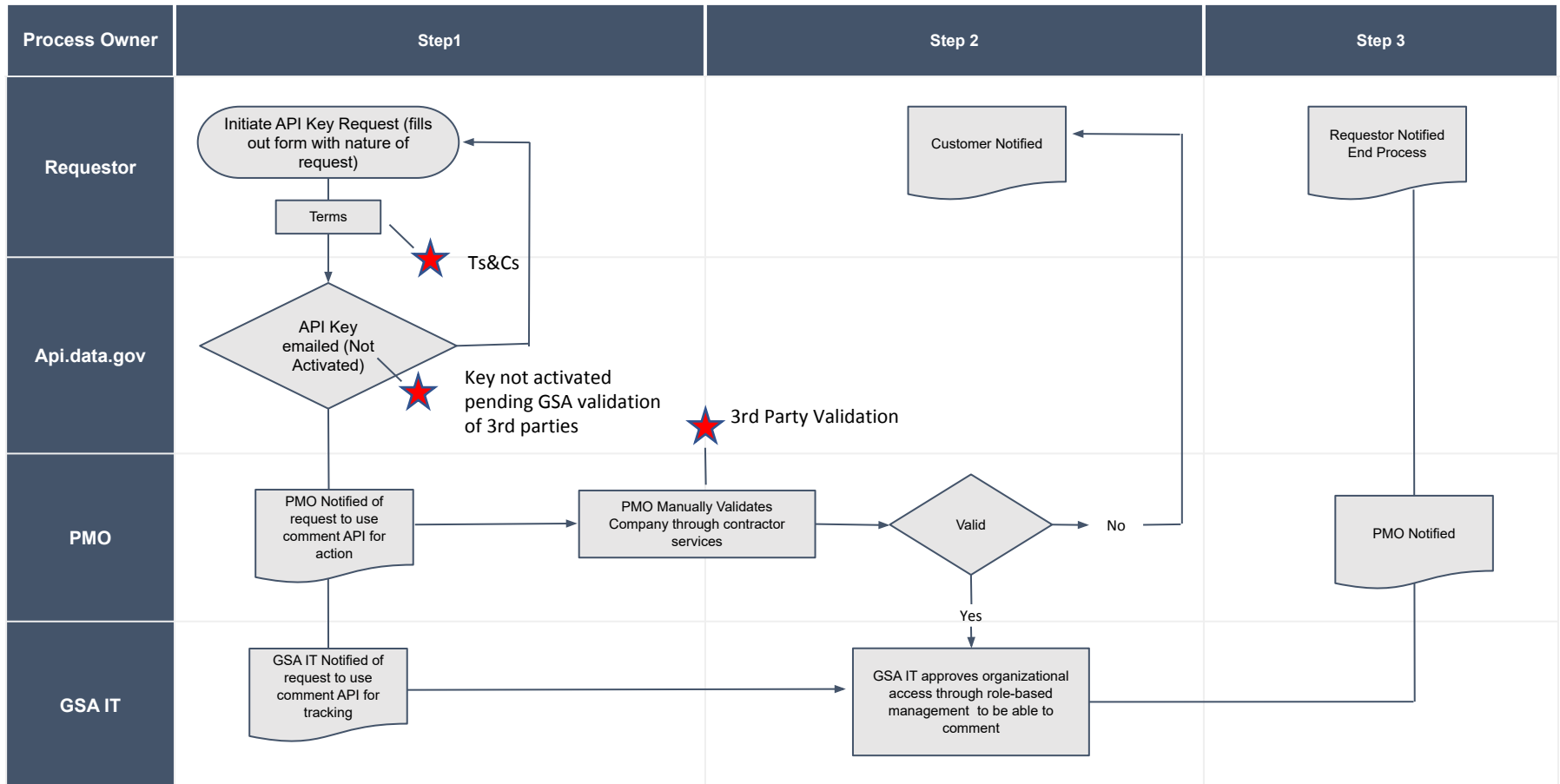
- reCAPTCHA defeats software.
- Submissions through Regulations.gov are limited to those generated by people.

### 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

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- 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

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## 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"><li>•Homepage – Login page, quick search, menu</li><li>•Document Management – Tabs, actions</li><li>•Docket Management – docket details, docket tree</li><li>•File Upload &amp; Attachment</li><li>•User Profile (Info and Password)</li><li>•Deduplication workaround</li><li>•Docket assignments</li><li>•Records Management</li></ul> | <ul style="list-style-type: none"><li>•Bulk Upload</li><li>•Work Queue</li></ul> | <ul style="list-style-type: none"><li>•MFA Security Requirement</li><li>•Cross-Agency Accounts</li><li>•Docket/Document Permissions</li><li>•Additional Document Actions</li><li>•Deduplication (full functionality)</li><li>•Bulk Extract</li></ul> |

# Overview of FDMS 5 Functions at Go-Live

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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

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- 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.

|               | <b>December</b> | <b>January</b> | <b>February</b> | <b>March</b> |
|---------------|-----------------|----------------|-----------------|--------------|
| <b>EPA</b>    | \$13,768        | \$6,159        | \$4,284         | \$1,853      |
| <b>DOC</b>    | \$11,972        | \$5,543        | \$1,836         | \$2,470      |
| <b>TREAS</b>  | \$11,374        | \$3,696        | \$612           | \$0          |
| <b>DOT</b>    | \$8,979         | \$2,464        | \$1,224         | \$4,323      |
| <b>USDA</b>   | \$8,381         | \$4,312        | \$3,060         | \$1,235      |
| <b>STATE</b>  | \$8,381         | \$4,312        | \$2,448         | \$2,470      |
| <b>DHS</b>    | \$7,782         | \$1,848        | \$612           | \$2,470      |
| <b>HHS</b>    | \$7,183         | \$8,623        | \$4,284         | \$3,705      |
| <b>DOL</b>    | \$3,592         | \$1,848        | \$612           | \$3,088      |
| <b>OTHERS</b> | \$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

|             | <b>“Low” Bulk Import Request</b><br>\$1400                                                                                                                                                                                                                                                                                                                                                 | <b>“High” Bulk Import Request</b><br>\$2800                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
|-------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Bulk Import | <ul style="list-style-type: none"> <li>An agency has 1 docket with 1 document currently open for comment. This document receives about 1500 comments.</li> <li>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.</li> </ul> | <ul style="list-style-type: none"> <li>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.</li> <li>An agency has 1 docket with 1 document receiving 500k comments. The agency submits multiple requests to upload comments throughout the comment period</li> </ul> |

## 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](mailto: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]

[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](mailto:erulemakingAPI+unsubscribe@gsa.gov).  
To view this discussion on the web visit [https://groups.google.com/a/gsa.gov/d/msgd/erulemakingAPI/CALT4n5PSIufA3aFXRi5T\\_Uewi5iOac%3D%2Bx%2B-xiALqe4EiQN8dTg%40mail.gmail.com](https://groups.google.com/a/gsa.gov/d/msgd/erulemakingAPI/CALT4n5PSIufA3aFXRi5T_Uewi5iOac%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](mailto: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](mailto: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](mailto: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://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).

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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]