

Template: Organization Commentators

The following is a brief guide for organizations intending to write a comment regarding a new proposed rule by the federal government. You can search for proposed rules and submit your comments on them [here](#).

[Date]

[Agency Address]

Re: "Title of Rule," Proposed Rule, Federal Register Citation, Docket ID, Regulation Identifier Number (RIN)

Dear **[Agency]**,

[Identity of Organization] submit(s) these comments regarding **[the Agency's]** Proposed Rule "Title of Rule," Federal Register Cite (Date). **[We]** write to express **[our opposition to]** or **[support for]** the Proposed Rule.

Introduction

1. Who is your organization?

- As an organization, describe your mission and how you accomplish it.
- Directly tie your mission to the proposed rule (as in, what expertise or perspective does your organization bring to comment on this regulation?)
- Describe the people or communities your organization represents and/or serves.

2. Why does this matter to your organization?

- Briefly explain why your organization is commenting on this proposed rule and why it matters to your organization, its members, and/or the communities it represents/serves. This is a chance to provide a short summary of what positive or negative consequences this rule would have for your organization and its members, personally or professionally.

Your Argument and Analysis

1. Get Specific: Identify *which parts* of the Proposed Rule you agree or disagree with

- Identify the relevant part(s) of the regulation you are commenting on and clearly state your opposition or support for each.
- Are there certain sections that you think are particularly incorrect or would lead to particularly bad results for your organization, its members or the people you represent or serve? If so, list (a bulleted list is fine) all the relevant part(s) of the proposed rule you plan to comment on and clearly state your disagreement with them.

2. Explain Any Negative or Positive Impacts the Proposed Rule Will Have

- Use your organization's own perspective and/or expertise to describe to the agency why you oppose or support the Proposed Rule. You can either explain in detail what harm(s) you think it would cause or what benefits you think the rule would have.
- **You should try to put things in your own words and get specific** (otherwise the agency might think your comment is the same as others and not appreciate your unique perspective and arguments).

3. If You Oppose the Proposed Rule, Point Out Where It Lacks Proper Factual Support

Highlight any factual inaccuracies, lack of factual support, or things that just don't make sense in the agency's justification for the Proposed Rule. Read through the agency's reasoning, and think about your own experience/expertise. Ask yourself:

- | | |
|--------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------|
| ✗ Does anything specific jump out as incorrect? | ✗ Are there places where actual facts are missing that could support or undermine whatever position the agency is taking? |
| ✗ Are there any logical leaps you don't think are justified? | ✗ Is there something that the agency is simply missing? |

Remember, be specific! Write out what specific part or section you take issue with and describe what in that section is wrong, unsupported, or too big of a leap. Explain how your organization's background, experience or expertise leads you to that conclusion, and if relevant include accurate information you think the agency should consider instead.

Recommendations

- If relevant, offer specific recommendations about changes you would make to the Proposed Rule. If the best change you see would be *not* to implement the entire rule or certain parts of it, you can say that.

Conclusion

- Here, you can write out a brief summary of your position and re-list any recommendations you would make to change this Proposed Rule.

Sincerely,

[Your organization and relevant employee name(s)]

Note: Public comments are *public*. If you do not want your regular email address listed, consider creating another email address for this purpose and not including other personal information (such as a phone number or physical address) that you don't want made public. You can also comment anonymously, and you may choose to do so if you fear reprisal for submitting comments. However, providing your name can lend credibility and context to what you say.

ABOUT US

Protect Democracy is a nonpartisan, nonprofit group working to prevent American democracy from declining into a more authoritarian form of government.

This publication should not be construed as legal advice on any specific facts or circumstances. The contents are intended for general information and educational purposes only, and should not be relied on as if it were advice about a particular fact situation. The distribution of this publication is not intended to create, and receipt of it does not constitute, an attorney-client relationship with Protect Democracy. This publication also contains hypertext links to information created and maintained by other entities. Protect Democracy does not control or guarantee the accuracy or completeness of this outside information, nor is the inclusion of a link to be intended as an endorsement of those outside sites.