

0031050

From: [Philip Selleck](#)
To: [Russ Wilson](#)
Cc: jason.waanders@sol.doi.gov; russ_wilson@nps.gov; [AJ North](#); [Doug Wetmore](#); MIKE_STEVENS@sol.doi.gov
Subject: Re: Fw: stakeholder concern about www.regulations.gov
Date: 08/10/2011 01:33 PM

Russ,

Regulations.gov does not have those limitations. The system has a very large capacity, since it handles regulations for all federal bureaus, departments and agencies. I called the help desk and they saw no problem with thousands of comments in an hour. I've taken bulk comments and posted them by the thousands in minutes; by posting, I mean copying them into Regs.gov from the outside. Though it was me on just one computer, it handled them quickly. I would advise against bulk comments for several reasons: 1) They are often form letters; 2) Some commenters are shocked when they see their names on the comments, and call or write to have their personal information redacted; 3) Individually submitted comments are easier to search; bulk comments may come in as pdfs and are harder to pull information from.

Phil

Philip A. Selleck
Associate Regional Director, Operations and Education
National Capital Region
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202-619-7142

▼ [Russ Wilson---08/10/2011 11:47:47 AM---Phil,](#)

**Russ
Wilson/CALO/NPS**
Sent by: Russ Wilson

To: Philip Selleck/NCR/NPS@NPS
cc

Subject: Fw: stakeholder concern about www.regulations.gov

08/10/2011 11:47 AM

Phil,

Any thoughts on this?

Russ

Russel J. Wilson
Chief, Regulations and Special Park Uses

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0031051

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----- Forwarded by Russ Wilson/WASO/NPS on 08/10/2011 11:47 AM -----

**Mike
Murray/CAHA/NPS**

08/10/2011 10:01 AM

To jason.waanders@sol.doi.gov, russ_wilson@nps.gov, AJ
North/WASO/NPS@NPS, Doug
Wetmore/DENVER/NPS@NPS,
mike.stevens@sol.doi.gov

cc

Subject stakeholder concern about www.regulations.gov

I was contacted yesterday by Julie Youngman of SELC and Walker Golder of NC Audubon regarding their concerns about the technical shortcomings of [regulations.gov](http://www.regulations.gov). Unlike PEPC, which apparently can handle a large volume of incoming comments, [regulations.gov](http://www.regulations.gov) can handle no more than 200 incoming public comments per hour. When the conservation groups send out an Action Alert on the CAHA proposed rule, they expect it will generate thousands of comments, typically within a few hours of the alert being issued. They are concerned that the comments will not be accepted by the system and end up being lost.

As a result, SELC and NC Audubon were informally inquiring about the possibility of submitting bulk comments since the government-designated comment system obviously cannot handle the expected volume. I discouraged them from the possibility of bulk comments and encouraged them to contact the [regulations.gov](http://www.regulations.gov) Help Desk for technical support.

Not sure any further action is needed on our part; however, I wanted to bring this concern to your attention because it would seem that [regulations.gov](http://www.regulations.gov) is not capable of handling the volume of comments on our issue. It would be bad if thousands of comments that are submitted according to the prescribed procedure were lost or not considered because we are not using PEPC. I believe someone at DOI should vigorously convey this concern to someone at [regulations.gov](http://www.regulations.gov).

Thanks,

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