Quick Guide for Submitting Comments Through the Pilot Comment Platform

June 27, 2016

Contents

I.   Accessing the Comment Platform

The platform is located at https://epa-notice.usa.gov. There is a lot of information on the homepage about the pilot and how to submit effective comments. However to access the proposed rule and begin drafting/submitting comments, you'll need to click the 'Read the proposed rule and write a comment' link (circled in red below).
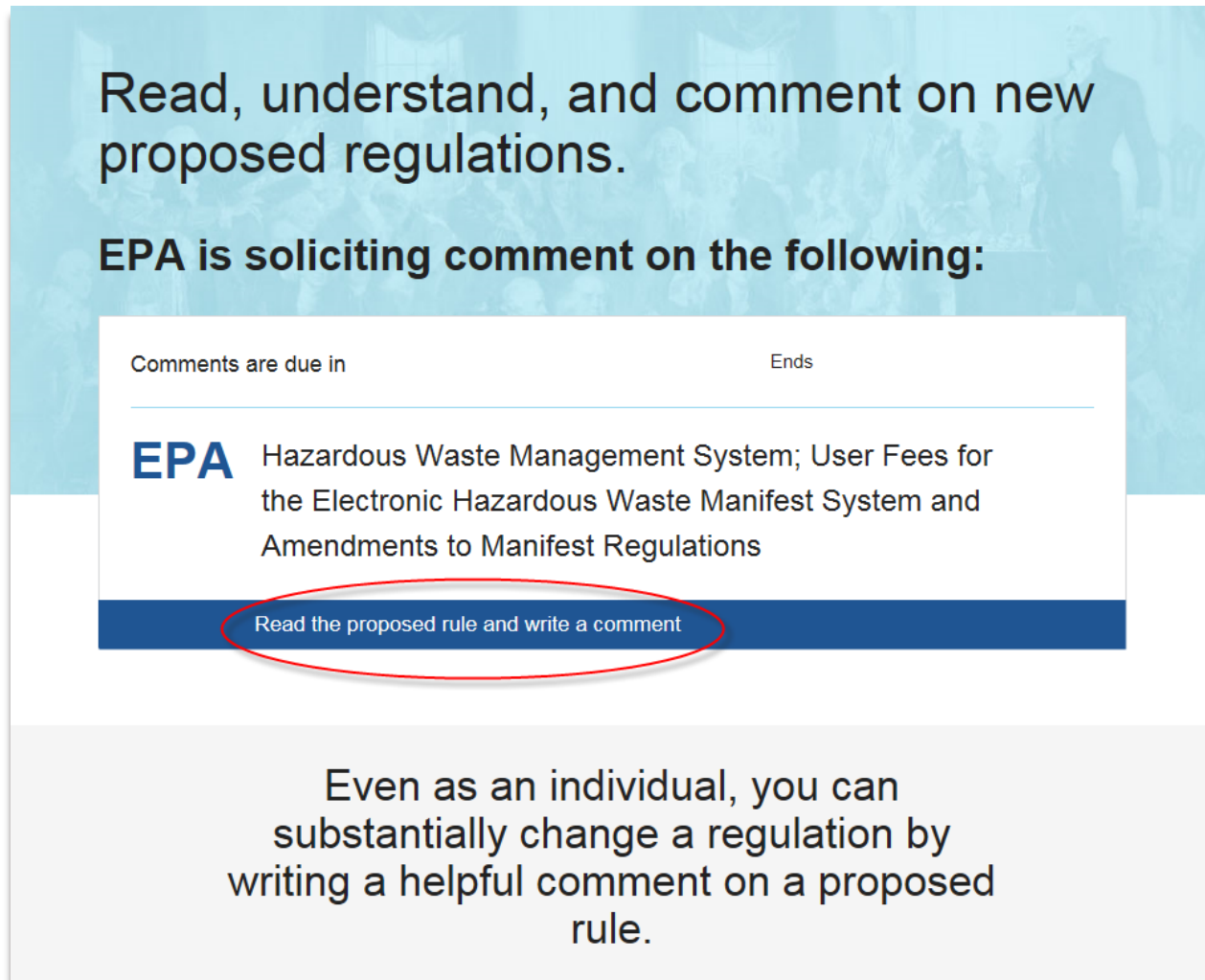
## II.   Navigating the Comment Platform

After selecting the 'Read the proposed rule and write a comment' link shown above, you'll be routed to the preamble main page (shown below).

The rule is divided by the tabs in the upper left corner into the preamble section (designated by 'Pre') and the proposed regulation section (designated by 'CFR' – which is the Code of Federal Regulations). The red arrow on the screenshots below shows the 'Pre' and 'CFR' tabs selected.

The preamble section is parsed by sections used in the Federal Register notice. Each section can be found in the table of contents on the left side of the platform. The TOC can be scrolled, and users can select sections in the TOC to more easily navigate through the rule.

The CFR section is also parsed, but by CFR citation. This section also contains a similar table of contents as found under the preamble tab. <u>The proposed regulations are displayed in green addition and strikeout</u>.
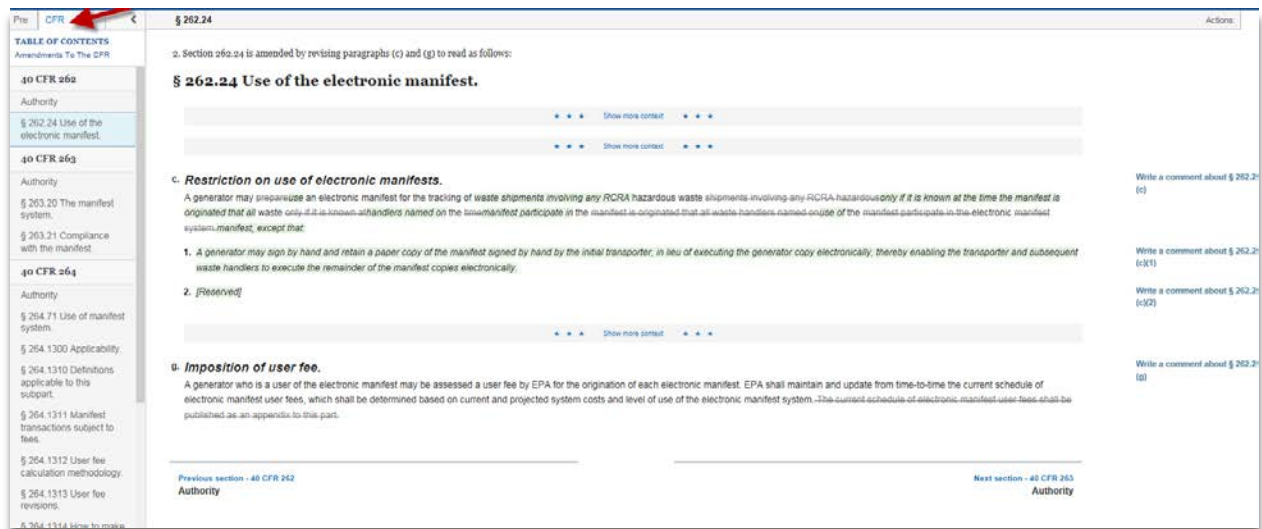
III.   Drafting Comments

Every section under both the 'Pre' and 'CFR' tabs contain a link to the right to "Write a comment about Section xxxx" (circled in red below). Hopefully, the link is self-explanatory… if you want to draft a comment on a specified section, click the link for that section.

After selecting a section, you'll be routed to the comment drafting page. On this page, comments should be drafted in the open text box (circled in red below). After drafting is complete, click the 'Save Response' button (shown by the red arrow). If you have additional comments to add on other sections, choose a section from the table of contents and repeat the drafting process.


IV. Uploading Attachments

For some comments, you may want to upload supporting material. In those cases, the 'Upload Attachment' button on the drafting page (shown circled in red below) can be used.

After you've uploaded an attachment, the name and size of the file is shown (circled below). After the upload, you can 'Save Response' and either continue to draft comments or review and submit.

The comment platform will generate a parent PDF containing all the drafted text comments, as well as the attachment file name (circled). When the comments are submitted to the docket, the parent PDF and all the uploaded attachments will be transmitted to the docket.
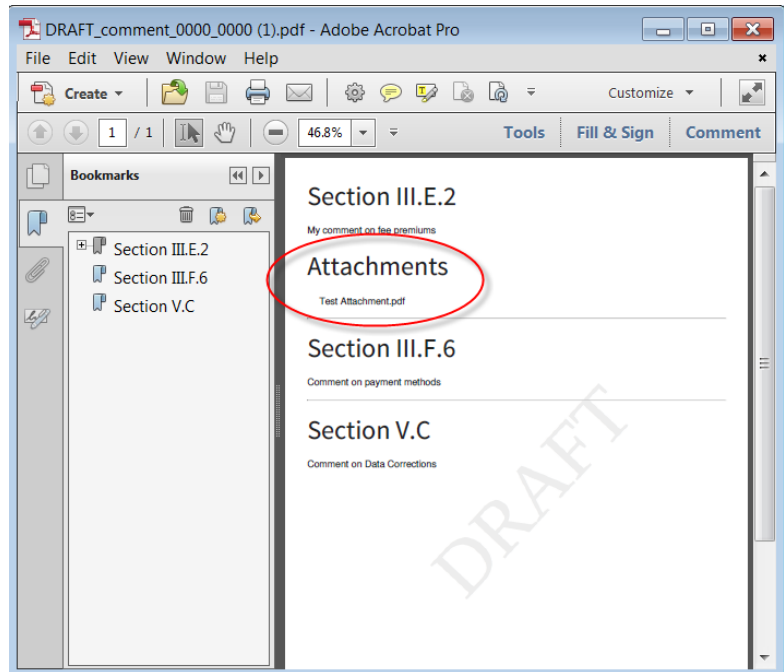
V.   Reviewing and Submitting Comments

After drafting comments, on the right side of the drafting screen you'll see in a gray box each section for which a comment was drafted and saved. Each comment can be reviewed individually through these gray boxes. Alternatively, the 'Review and Submit' box can be selected which will route the user to the 'Review your full comment' (shown on subsequent screen capture)
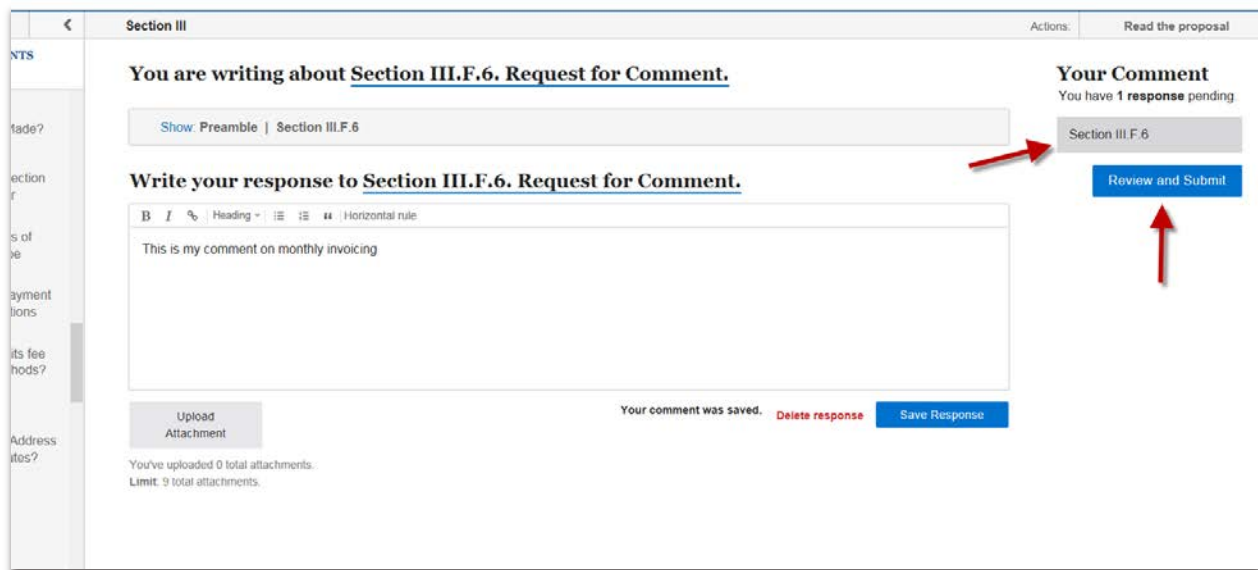
The 'Review your full comment' page shows all the comments drafted, and allows the users to edit these comments. Please note that the Section number cannot be edited.

To complete the submit process, the user needs to check the box (indicated by the red arrow), and select the 'Submit your comment' button. The section for 'submitting on behalf of…' (circled in red) is optional and mirrors what regulations.gov collects for most agencies. This section on the comment platform defaults to 'submitting on behalf of myself', which matches the default setting on regulations.gov. Regs.gov contains a 'submitting on behalf of a third party' checkbox, which defaults to unchecked.

If the user selects submitting on behalf of an organization or government agency, additional boxes for optional information will appear.

VI.   Building your Comments as a PDF

The platform will generate a PDF based on your comments, which is what will be submitted to the official docket. The PDF can be downloaded prior to submitting to the docket (option circled in red below).

This screen capture shows an example of the summary of draft comments prior to submitting. Note the 'DRAFT' watermark. After you officially submit, you will have an opportunity to save a PDF of your official comments (without the watermark).
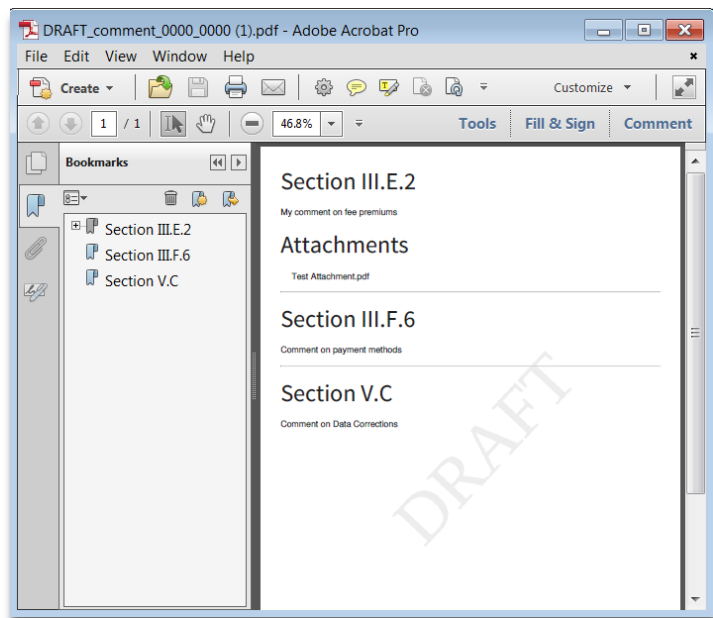
After submitting your comment, the PDF can also be downloaded (without the DRAFT watermark) and saved for your records. After your comments are processed, you will also be able to download your comments from the docket through regulations.gov. <u>We recommend you save your draft and final PDFs in case there are technical issues with the pilot</u>.
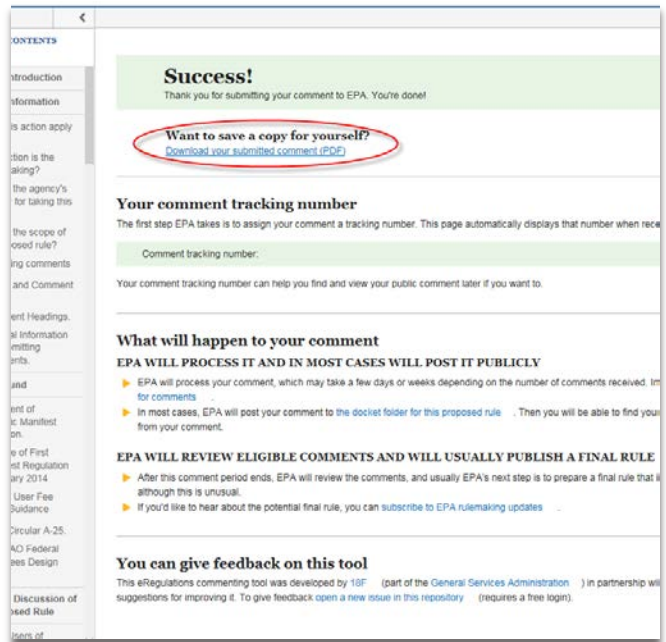
VII. Confirmation and What Happens Next

After submitting comments, you should see the screen below, except you should see your unique tracking number. <u>Again, you may want to record this tracking number in case of technical issues.</u>

Submitted comments go directly to the Federal Docket Management System (FDMS), at which time the EPA docket center will process your comments and publically post on regulations.gov. As with any comment submission, there is some lag time between the time of comment submission and the time of posting on regulations.gov.
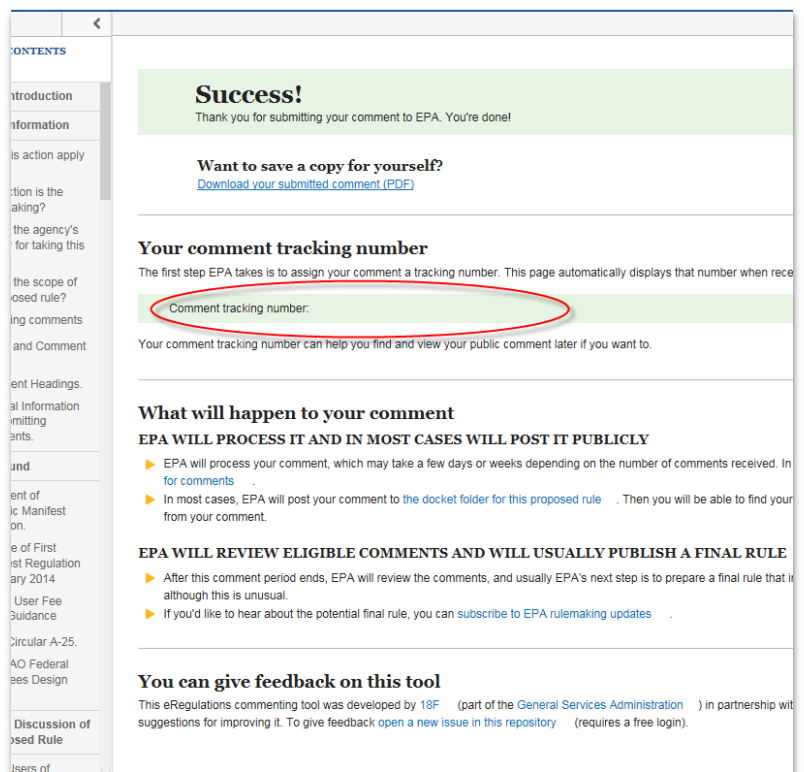
VIII. User Session

Ideally, we would have built a way to manage user accounts on the platform. However, not knowing yet if this platform will be the long-term solution, this functionality was not built. Your internet browser session, if continuous, should retain information drafted, but <u>we strongly recommend that you draft and submit your comments in one sitting</u>.

IX. Including Organization Information with your Comments

We realize that many commenters typically submit organization information as an introduction to their comments. However, the pilot comment platform does not have a specific area to collect this information. As a work-around, we ask for organization information to be submitted as a comment under 'preamble introduction' (shown through the screen captures below).

X.   Feedback

We NEED your feedback on this pilot. There are two places on the comment platform to send feedback: (1) at the very bottom of the homepage (https://epa-notice.usa.gov/), and (2) at the bottom of the 'submit' page. Both are shown below. If you would rather send feedback by email or phone, feel free to contact William Noggle at noggle.william@epa.gov or 202-566-1306.