

April 27, 2006

Legislative Services Agency  
Attn: Steve Barnes  
One North Capitol, Suite 325  
Indianapolis, Indiana 46202

Dear Mr. Barnes:

Pursuant to the request on the cover of the May 1, 2006 *Indiana Register*, I am writing to submit my comments and suggestions regarding upcoming changes in the *Indiana Register*.

As set forth in the request for comments, the changes are: “the *Indiana Register* will be published only on the Internet and on a more frequent basis.”

The devil, of course, is in the details – it is nearly impossible to submit meaningful comments without the details. Therefore, my first suggestion is that your agency post online, before May 15<sup>th</sup>, a parallel version of the complete contents of the May 1, 2006 *Indiana Register*, using all the conventions that you intend to employ on and after July 1, 2006.

Seeing precisely what is proposed, six weeks in advance of the changes, will better permit the various state agencies who are required by law to publish in the *Register*, and the various regulated communities, to assess the workability and impact of the proposed changes.

My second suggestion is that your agency act immediately to clarify the phrase “on a more frequent basis.” On the third page of the May 1 *Register*, the statement is made that closing dates for submission of materials to the *Register* office, now the 10<sup>th</sup> of each month, after July 1 “will be determined on an individual document basis.”

I cannot speak for other regulated communities, but I can say that much of environmental rulemaking revolves around the regular publication date of the *Indiana Register*. Specificity is essential here, whether “publication” is to be the 1<sup>st</sup> of each month, the first of each week, or every other Wednesday.

Both the new *Indiana Register* submission deadlines and the resultant publication (posting) dates need to be announced and published by your agency as soon as possible – public meeting dates, comment deadlines, public hearings and more turn upon the *Indiana Register* “publication date.”

Further, once these new *Indiana Register* submission deadlines and publication dates have been announced and published, it is important that they not be altered thereafter without six months advance notice.

Best regards,

Marcia J. Oddi

cc: Phil Sachtleben