

**Echols, Mabel E.**

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**From:** Milton Recht  
**Sent:** Monday, March 16, 2009 7:05 PM  
**To:** FN-OMB-OIRA-Submission  
**Subject:** Federal Regulatory Review comments

Office of Information and Regulatory Affairs  
Records Management Center  
Office of Management and Budget  
Attn: Mabel Echols  
Room 10102, NEOB  
725 17th Street, NW.  
Washington, DC 20503.

Re: Comments on the Federal Regulatory Review process

There are many areas of regulatory review that can be improved. I will focus my comments on the area of the regulatory cost of a proposed rule change. I believe expanding the items included in cost estimates will produce a tremendous improvement of the review process without either unduly delaying the enactment of regulatory changes or substantially increasing the costs of reviewing regulations.

I would like the OMB to standardize an expanded definition of costs to include social, non-monetary and negative costs (cost savings). Furthermore, OMB should mandate or at least request that federal agency review of the costs of proposed regulatory changes include itemized estimates of social and non-monetary costs in addition to actual out of pocket monetary costs.

Some examples to clarify social, non-monetary and negative costs are:

Estimates of lost revenue and lost cost-savings to a business of a proposed regulatory change that will increase the time needed to accept or process an application or other paperwork.

Estimates of costs to a business of proposed regulatory changes that will increase the costs of monitoring compliance.

Estimates of the changes to the prices of final consumer products, and the total annual consumer cost, caused by regulatory changes required of the producers, intermediaries, raw material suppliers or shippers in addition to the costs borne by the regulated entity.

Estimates of the dollar costs, or negative costs, of lost business efficiency and productivity due to regulatory changes affecting workers, such as a change to government benefits that increase worker absenteeism to apply for eligibility, continue eligibility, or use a government benefit or service.

I believe the presentation of an expanded definition of the costs of a proposed regulatory change will allow the government, its regulatory agencies and the public to more accurately assess the impact of a proposal.

Thank you for considering my comments.

Sincerely,

Milton Recht  
Recht & Company  
Mount Kisco, NY

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