

[EXTERNAL] OMB Control Number "1018-Friends"

Morton Nelson <morton.nelson@gmail.com>

Wed 11/11/2020 12:44 PM

To: Info_Coll, FWHQ <info_coll@fws.gov>

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From

Morton Nelson

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Comments on

Whether or not the information will have practical utility? The need for a FWS spreadsheet of information is very questionable without establishing that there are major problems with the way Friends groups are functioning now. The recent Inspector General audit didn't indicate there were systemic problems with Friends organizations, but this rules change would certainly create problems.

The accuracy of our estimate of the burden for this collection of information, including the validity of the methodology and assumptions used is cynical. Friends are volunteers, not FWS employees or people seeking a business license. The suggested rules change creates the obligation every year for each Friends group to fill in quantitative information on a form for FWS. Based on the time estimate given in the Notice chart, each Friends group would be required to spend 212 hours on paperwork each year to provide FWS with the information requested. The workload would fall unevenly on a few volunteers who have the computer and bookkeeping skills necessary. There may be no cost to FWS in dollars, but there is a very high cost to each Friends organization, with a small number of volunteers forced to complete 212 hours of boring paperwork each year.

The accuracy of our estimate of the burden for this collection of information, including the validity of the methodology and assumptions used is suspect. Friends members would consider some of the information requested as hostile. For example, "Resumes of potential Friends group staff selected to work in visitor center." That statement suggests to me that the person who wrote this request doesn't have a clue about the difficulty of getting volunteers to staff a visitors' center. "Selected" implies that working in a visitors' center is a much sought-after role instead of a hard-to-get voluntary commitment of time. If my resume is required to meet and greet, I certainly won't volunteer in the visitors' center. I would refuse to provide a resume because I don't trust my personal information to "anyone" with access to the FWS/federal government database, to be used as that "anyone" sees fit. A lot of damage has been done to public trust in government, and pushing unnecessary and invasive regulations will not inspire people to volunteer.

[EXTERNAL] 85 FR 71354

Morton Nelson <morton.nelson@gmail.com>

Wed 11/11/2020 12:35 PM

To: Info_Coll, FWHQ <info_coll@fws.gov>

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Agency/Docket Numbers:

FWS-HQ-NWRS-2020-N145

FF09R81000

OMB Control Number 1018-New

Document Number:

2020-24802

Comments on

Whether or not the information will have practical utility? The need for a FWS spreadsheet of information is very questionable without establishing that there are major problems with the way Friends groups are functioning now. The recent Inspector General audit didn't indicate there were systemic problems with Friends organizations, but this rules change would certainly create problems.

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