

Whither Deliberation?

Mass e-Mail Campaigns and U.S. Regulatory Rulemaking

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Introduction

Imagine if I stood up at this professional meeting and said:

“If only Information Technology had been used to facilitate online dialogue and deliberation with the ENEMY, Al Queda, prior to 9.11, we might have resolved our differences. We might all have come to better understand the other sides’ point of view. We might have collaborated to find a better solution than mass murder.”

If I said such a thing, aside from thinking I was insane you probably would howl and hiss in a manner not often seen at such meetings. But, if instead I said:

“If only Information Technology could be better used to facilitate online dialogue and deliberation with the ENEMY, (say, Industry, Government, the environmentalists, Ralph Nader, or whomever), we might have resolved our differences. We might all have come to better understand the other sides’ point of view. We might have collaborated to find a better solution than, say, allowing a suboptimal dose of mercury pollution into our nation’s air that may ultimately harm or kill more people than died on September 11th, 2001.”

A few observers might endorse the second argument. Some would call it democracy’s technological cutting edge. That is, the potential in the United States for information technology and Internet-enhanced participation in the notice and comment process to become widely distributed, reflexive, transparent, information rich, asynchronous, low-cost, and meaningful. Others openly hope for a regulatory rulemaking system free of the exercise of power, intimidation, deception, single-mindedness, and other forms of even more commonplace treachery. In a word, the second argument is about transformation.

Of course it is ridiculous and theatrical to compare the dynamics of Jihadist zealotry with the behavior of admittedly sometimes visibly desperate actors US regulatory rulemaking. Allow me to nonetheless suggest, somewhat provocatively, that online participation in US rulemaking, at least for the foreseeable future, is no more likely to transform how regulatory decisions are made in the United States than it is to resolve the many issues underlying our current war on a tactic.

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While the potential and visible need for meaningful forms of online deliberation is certain, for most participants in the heavy-traffic U.S. rulemakings we have studied, it is latent and undeveloped. Technological optimists will argue that online deliberation will indeed be transformative someday, but only when it is structured appropriately and by the right people. I am a little less sanguine, based on the state of the art in electronic rulemaking, some preliminary findings in a pair of ongoing studies, and because finding the “right people” is terribly difficult.

I am currently working on related NSF-funded projects that grew out of discovering the National Organic Program rulemaking online. In that instance, the United States Department of Agriculture (USDA) took in approximately 277,000 comments on their initial proposed standard for the term “organic” in U.S. agriculture. Of those comments, more than 20,000 were submitted via a web form set up by midlevel USDA personnel for a 90-day comment period. Respondents using this online interface had the option to see comments that had already been submitted, no matter whether they came by the web, fax, or postal mail, and to enter their own comments via a web form. In early 1998 it was a substantial innovation at USDA to allow commenters anywhere to see online the comments of others. The organic rule writers we interviewed reported that this “open docket” design resulted in a significant number of comments on other comments. This was, at first glance, suggestive nascent online dialogue and deliberation in federal rulemaking and on a large scale.² We were intrigued and wanted to see if it was part of a trend in eRulemaking.³

So, in one project, with my collaborators, David Schlosberg (who is political theorist at Northern Arizona University) and Stephen Zavestoski (who is an environmental sociologist at the University of San Francisco), we are looking more systematically for signs of deliberation in a set of rulemakings in which the presence of an online open docket and a controversial environmental issue created at least the possibility for some degree of online deliberation amongst commenters with divergent points of view. Last year we trained 10 undergraduates to code a sample of public comments from three rulemakings where the presence of an open docket created the possibility for deliberation.

Specifically, we were looking for signs that commenters had read other comments, or had otherwise demonstrated the type of behavior that deliberative democratic theorists indicate is desirable. We looked for signs of deliberation instead preference aggregation, inclusion of difference, respect for a variety of positions, transformation of preferences, as well as expanding and authentic discourse. To date we have uncovered little evidence that the presence of an online open docket transforms the behavior of commenters. It may suffice to say for now, while the study is still underway, that the barriers to online deliberation, at least in US regulatory rulemaking, are less technical than they are social, political, legal and architectural in nature.

In the other project, with a pair of gifted computer science colleagues, Jamie Callan at Carnegie Mellon University and Eduard Hovy at USC’s Information Sciences Institute, we are developing and testing the efficacy and effects of new information retrieval tools tailored to the

² Stuart W. Shulman. 2003. "An Experiment in Digital Government at the United States National Organic Program," *Agriculture and Human Values*, 20: 253-265

³ Stuart W. Shulman, David Schlosberg, Stephen Zavestoski, David Courard-Hauri. 2003. “Electronic Rulemaking: New Frontiers in Public Participation,” *Social Science Computer Review* 21 (2), 162-178.

rulemaking environment. As part of this project, we have convened a series of workshops and focus groups with governmental and non-governmental stakeholders involved in regulatory rulemaking. At these workshops, we demonstrate the state of the art in our research and development of algorithms that can, among other things, quickly and efficiently identify duplicate and unique text added to near-duplicate comments and then we ask how the availability of these and other advanced language processing tools might impact the rulemaking process.

The reason we do this is that agency personnel have repeatedly told us that the emergence of first generation electronic rulemaking has had the singular effect of increasing the flood of duplicative, often insubstantial, mass mailing campaigns. These campaigns exist for many legitimate reasons, politically and organizationally speaking. However, they do little to move administrative rulemaking toward the ideal of enlightened online deliberation and they do much to try and swing the pendulum away from administrative expertise and toward plebiscitary, direct democracy via electronic preference aggregation. This terrifies administrative law scholars and practitioners in the US civil service and fails rather miserably to move the process to a higher deliberative plane.⁴

So, where is all this heading? Interest groups that contract with a thriving e-advocacy sub-sector of the Washington, DC economy now routinely set up clusters of web action centers. The system generates voluminous quantities of mass e-mail comments. One firm promotes itself with a counter on the home page that claims credit for more than 16 million constituent messages this year. Meanwhile, practitioners in agencies face mounting congressional and executive demands for efficiency and effectiveness in the highly charged political and ideological environment that is a backdrop for reading and responding to the comments. With billions of dollars and quite probably the nature of life on earth are at stake, the sad fact is the future of regulatory rulemaking can look a bit bleak.

These machinations occur in part for reasons that have little to do with improving the final rule. Modern data mining and outreach techniques in the Internet-based age mean that increased membership lists and donations are at stake. Groups also seek free media and other forms of Internet-driven publicity (ex. coverage in blogs). Large public comment outpourings may work as delay and litigation tactics, as well as congressional wake-up calls to revisit an issue. These are only a few of the many reasons for the proliferation of duplicative, insubstantial electronic postcards that federal officials have been known to speak dismissively of as “awareness” campaigns.

Some groups believe that overwhelming an agency like the Forest Service with form letters will result in a favorable outcome. Devotees to one or the other side in the battle over the Roadless Conservation Area rulemaking might, at this late date, wonder whether all the spilled ink and clicked send buttons have actually been efficacious in the face of mountains of litigation that keep the rule in the courts. While these campaigns are presumed to be largely ineffective because they

⁴ Jeffrey Lubbers warns the “overall trend has been away from the expertise model and toward the politics model,” as the comments submitted increase by orders of magnitude. See Jeffrey S. Lubbers (ed.) *Developments in Administrative Law and Regulatory Practice 2002-2003* (Chicago, IL: American Bar Association), 149-150.

generate little new information, in some instances (ex. the EPA's ANPR on the Definition of US Waters post-SWNCC, or the USDA's organic rulemaking, where about 100,000 unique comments carried enormous weight with officials) it does at least appear to contribute to an outcome favorable to the mass mailers. The organizational incentives combined with occasional claims of victory suggest the practice is likely to dominate the near future of electronic rulemaking.

Current Research Activity

Our research group recently acquired (and made available to other researchers) a dataset of 536,975 public comments submitted via e-mail to the Environmental Protection Agency (EPA). With the exception of a smattering commercial spam e-mail, and a few more than 5,000 that were comments on three other Office of Air and Radiation (OAR) rulemakings, all the email was submitted for consideration as part of EPA's OAR-2002-0056 docket, which is colloquially known as the mercury rulemaking.⁵ Officials privately report that departing EPA Administrator Michael Leavitt made the March 2005 promulgation of a new standard and timetable for mercury reductions the top EPA priority.⁶

We have just begun to formally examine the content of the mercury comments. In one ongoing study, 1000 e-mail messages were selected at random and prepared for analysis using Atlas.ti, a qualitative data software package. Five graduate student coders and one graduate student project manager received specialized training in the use of the software. A day-long session included practice with a smaller sample of the mercury rulemaking data and group discussion-based refinement of a coding scheme (see Appendix A), which itself was adapted from earlier efforts with other public comment datasets derived from rulemakings with heavy participation and a central environmental issue.

At this early stage in the research (and in the epoch of mass e-mail campaigns) there are few indications that online deliberation is enhanced within the current eGovernment configuration in the United States. The mass e-mail campaign in particular appears to be an odd and possibly counter-productive tribute to twentieth century notions of one-directional, non-deliberative, un-reflexive nose counting. What a shame!

Observations from a First Cut through 1000 Mercury Emails

1) E-mail is not a good medium for deliberative acts such as comments on other comments already submitted or respect for different points of view.

It simply does not happen via email. Looking backward, it should have been more obvious that e-mail clients and web advocacy services are simply not setup to promote reflection on, or responses to, comments from people you disagree with. The architecture of e-mail is structurally ill suited for deliberation about the merits of a proposed rule. When a user of a web advocacy form is constructing their unique addition to a form letter (which is delivered as an e-mail), the response is rarely to the actual proposed rule published in the *Federal Register* and probably never to the

⁵ For the EPA's "Basic Information" on the rulemaking, see <http://www.epa.gov/air/mercuryrule/basic.htm>.

⁶ ABC News reported December 11, 2004 that President Bush will make an "aggressive push" in Congress, early in the 2005, for new clean air legislation. See <http://abcnews.go.com/Politics/wireStory?id=322212>.

reasoned claims of the other side. Rather, it is to the appeals and imagery of the advocacy campaign organizers. Perhaps the only real possibility for finding any significant quantity of actual online deliberative behavior might be a sample of only people who comment from inside an actual web-based EDOCKET system, or some other system that fits the architectural definition of an open docket.

2) The ability to amend form letters generated via web advocacy campaigns results in very few substantial additions to pre-formulated awareness campaign text.

Preliminary analysis of the coding suggests that about three out of every four e-mails in the sample were identified as 98-100% identical form letters, with another one in six identified as 70% identical. These are the categories the Environmental Protection Agency has developed for the manual sorting of mass e-mail campaigns. Hence at least 11 of every 12 e-mails in the sample were identified (by first time student coders) as identical or similar form letters. In a subset of 680 documents that were coded by only one student, a 105 instances of unique text added to a form letter were identified. In the 320 documents coded by two students, 113 instances of unique text added to form letter were identified. In 43 cases, both coders identified the unique addition to a form letter in a document they shared. In 27 cases only one coder identified a unique addition to a form letter, a point meriting further discussion below.

Having had the coders identify 173 unique additions to form letters in our sample of 1000 e-mails, the content was then sub-coded revealing several common attributes and very few substantive comments. The sub-code list included: Agency Mission (38), Anecdotes (5), Catering to Business (49), Children's Health (58), Disbelief (30), Higher Values (9), Insults (12), Public Interest/Health (52), Quickies (37), Shame (10), and Substantive Claim (3). To get a sense of what agency officials find in their e-mail In-Boxes, Appendix B presents (verbatim) all 37 Quickies, which were unique additions to form letters that consisted of no more than 1-2 sentences. In Appendix C, samples of the verbatim text coded to Children's Health, Insults, and Shame are presented to convey the varied (but not so much) flavor of the "form+" content. It is significant that in 173 unique additions to form letters, there were only three coded as a Substantive Claim, defined in this instance as something that might actually impact the decision of a civil servant.

3) Humans appear to make a significant number of analytical mistakes identifying what is unique in a form letter.

In our first round of mercury coding, at least one student with plenty of training and aptitude missed about 40% of the identified unique additions to form letters when coding about 250 comments. We cannot say yet how many times both students coding an identical document missed the unique text. For now, there remains little doubt in my mind that the development of natural language technologies for the automatic and reliable identification of duplicate and near-duplicate mass e-mails, and a range of tools for extracting and displaying novel additions to such letters, will radically change the dynamic currently at work. It will lead to a second and third generation e-advocacy sector with perhaps more creative electronic interfaces for promoting informed and effective civic engagement in deliberative electronic rulemaking.

4) Mass e-mail campaigns may do more harm than good if they make it harder to find the useful comments or lower the estimation of the public role in the minds of regulators.

Even if there are a few more substantive (though not deliberative) comments in the mix, (and based on the mercury sample, perhaps less than 1% of every addition to a form letter may be substantive) the more the volume increases the more likely that anything good submitted will be lost under the current sorting regime, which consists of hiring for profit contractors and manually identifying “unique comments” by eye while looking at the printed version. Based on this preliminary exploration of the mercury sample, for every one or two brief but substantive comments tacked on to a form letter e-mail you will also have to read 98 or 99 pithy, pleading, condescending, name calling, or otherwise useless comments. It may do more harm than good when hastily typed, unreflective tirades are the bulk of the comments and they drown out the people whose carefully drawn comments might actually make a difference.

Conclusion

I am obviously getting a bit cynical. The rub is this: whether for good or bad, the current system means that old fashioned rules of thumb, like the 20-page rule, or the letterhead rule, are effective filters for officials who say they know in advance what they will need to read and what it will say. While the occasional lone voice speaks to us about the thrill of finding a gem in amongst a large number of duplicative thoughts, the agencies mostly farm that analytical work out to contractors and focus on what conventionally is known to matter. No doubt the best intentions of emotive, pleadings citizens will continue to result in floods of redundant comments; e-mail is a boon for generating those.

We in the eRulemaking Research Group do not all reach the same conclusions about what is observable so far, neither in the data nor the responses of various actors involved. We are not without some shared hope, however, that innovation both at the federal level and in the NGO and e-advocacy sectors will eventually result in more meaningful online deliberation in controversial rulemakings.

One can imagine deployment of more creative uses of IT by the groups to engage their members in innovative, IT-enhanced efforts to distill the wisdom of the collective. For example, interest groups could retain their ability to mine the participants for data while getting 10, or 20, or even 50,000 people broken up into small groups that brainstorm, deliberate and distill, then the groups aggregate into larger clusters of groups, then clusters of clusters, who all along can visualize via the web, the best ideas, examples, stories as they rise to the top. With a highly interactive goal in mind, you can imagine all sorts of Meetup.com style engagement add-ons and other innovative tools, like those developed by Peter Shane's "PICOLA" project at Carnegie Mellon University⁷ and Beth Noveck's "Cairns" project at the New York Law School.⁸ There are a number of possibilities about how this might emerge over time, yet to date, they remain the largely the dreams of theorists who reside outside the beltway and whose work is at least one-step removed from the actual rulemaking battleground.

⁷ See: <http://communityconnections.heinz.cmu.edu/picola/index.html>.

⁸ See: <http://www.nyls.edu/pages/2150.asp>.

Appendix A

Mercury Code List: Context Dependent Codes (Capture Relevant Surrounding Text)

Comment on a Comment: Text that refers to another comment submitted during the public comment process

Comment on a Position: Text that refers to a position held by an NGO, group, or citizen, **BUT NOT** explicitly noted as found within the docket

Difficult to Code: Text that seems not to fit anywhere, but which also seems significant, or which in some way blurs the boundaries between existing codes

Disrespect: Text in which the substance or tone of the comment demonstrates disrespect for another position, person, group, or comment

Doomsayer: Text that argues in the “worst case scenario” mode

Economic: Text that uses an economic rationale to make a claim

Expertise: Text that invokes an earned right to call oneself an expert (e.g., an advanced degree or job training)

External Authority: Text that gives as a reason for holding an opinion that it is the view of some authority such as a trusted person, organization, religion, science, etc.

Good Quote: Text that is demonstrative of the meaning of a code, the nature of the process, or which is otherwise just so interesting or funny

Information in Docket (not comments): Text reflecting that the commenter has read, and is responding to specific information in the docket **BUT NOT** another comment

Legal: Text that cites a legal basis to make a claim

Personal Experience: Text that invokes personal knowledge, experience, or narrative as the basis for a claim

Proposal: Text that makes a suggestion for a specific new policy or change in an existing policy

Public Health & Safety: Text shows concern for public health and/or safety

Science & Technology: Text that points to scientific or technical knowledge

Social Values: Text that invokes social values to make a claim

Suspicion-Corruption: Text that reveals a commenter is suspicious of one or more aspects/actors in the rulemaking

Trust: Text that reflects the presence of trust in government to make decisions

Non-Context-Dependent Codes (Capture ONLY Necessary Text)

Stakeholder: Text that names her/himself as a part of some group—whether abstract (like “mother,” “small business owner,” or “doctor”) or concrete (like “Sierra Club” or “Society of Wetland Scientists”) {FRACTION OF SENTENCE}

Stock Phrases: Passages of text that are positively identified as duplicative or mostly similar {VARIABLE: SENTENCE OR PARAGRAPH(S)}

Strength=High: If the Holder is unusually vehement, using exclamation marks, ALL CAPS TO SHOUT, or some other passionate expression {SENTENCE LEVEL}

Strength=Low: Holder specifies the opinion is weakly held {SENTENCE LEVEL}

Strength=Medium: An average expression of opinion {SENTENCE LEVEL}

Topic (not mercury): The issue about which the Holder holds an opinion. If the Topic is the current topic (e.g., proposed mercury regulation), just do nothing; if the Topic about which the Holder has an opinion is something else (e.g., a subtopic like EPA’s failure to rely on the scientific consensus on mercury’s health threat) then code it “Topic (not mercury)” {FRACTION OF SENTENCE OR PHRASE LEVEL}

Unique Text in a Form Letter: Text that is suspected of being added-on to a standard form letter {VARIABLE: SENTENCE OR PARAGRAPH(S)}

Appendix B

All 37 Verbatim Passages Assigned the Sub Code "Quickies"

Drawn from the 173 Total Quotations Coded "Unique Text in a Form Letter"

(Definition: Quickies are 1-2 sentence additions of unique text to form letters)

What could be more important than keeping our children healthy ? "Money" ? • Stop this administration from poisoning our families! • President Bush has an abymal record on the environment. It will be a key factor in not voting for him this Fall. • Mercury is a scientifically proven risk to children's health and its emissions need to be regulate immediately. • Safeguard our children, not big business' pocketbooks! • I find it appalling that anyone would put profits above the health of the American people. • To protect our most sacred investment in the future, our children. • Action now will save \$\$ in medical costs later • Come on EPA, do your job and protect the people of this country. • EPA, plz for the sake of our children! have the power plts d!reduce mercury asap. • In my town the tree leaves are turning black from car emmisions. cough cough. • I am concerned that corporations are ruling our country todayas follows. • Cut pollution. Stop destroying our environment! • Where does the stupidity originate?? • The current administration is an affront to its citizenry. • Your agency is called the Environmental Protection Agency - the environment needs your protection now. • For us non-redmeat eaters whose diet consists of large amounts of salmon and Tuna, the mercury levels are affecting are health. • We are counting on you to protect our children and all citizens from mercury poisoning. • A penny saved is a penny earned. A stitch in time saves nine. • P stands for PROTECTION! get with it, or go away! • The technology exists to cut mecury pollution--let's do it. I, for one, am willing to pay the extra cost of electricity as a result. • We expect the EPA to enforce rules to protect Americans against mercury pollution. • PROTECT THE CHILDREN, NOT THE CORPORATIONS! • Your mandate is to protect citizens, especially the vunerable. Do not weaken the proposal to limit mercury • It's disgusting that you place the special interests of a handful of contributors over that of the health of hundreds of thousands of kids. What on earth is wrong with you people? • How can we even think of postponing doing something about this???? Even 4 years seems too long to get this under control. • Please don't cave to political pressures, our lives depend on it especially our children's. • DO not allow the Bush Administration to un-do the efforts of past leaders to stop this dangerous poison from being allowed in unsafe amounts in our water. • So get it together or we will replace you! • I don't want to die an early death because of this stuff that george bush does. • Bottom line, you know that Mercury Pollution is a serious danger. It's time we protected not only our children, but all of our people against this threat. • Go back to the time of the Clinton Adm. rules and enforce them. • Mercury is very dangerous to my health and the health of my family. • Please continue to protect this nation's air and water. We are only as strong as the resources we can protect. • I DON'T WANT MERCURY IN MY WATER!!!!!!!!!!!!!! • NO cap and trade. Just firm measurable limits on ALL mercury poluters everywhere in the USA • Please strengthen the BART (Best Available Retrofit Technology) Rule to bring cleaner air to our national parks.

Appendix C
Sample Verbatim Passages from Salient Sub Codes
Drawn from the 173 Total Quotations Coded “Unique Text in a Form Letter”

Children’s Health (Definition: Any text that makes a claim about children’s health)

Start protecting the citizens, especially the children, by standing up to those whose self interests are running this show. • The people who will suffer most from this will be poor women and children. • Doesn't the welfare of our children come first? Enact more regulations for big business and keep our children safe!!!! • Since I know that you have professed to care a lot about children, including the unborn • hopfully this issue will be addressed before it is to late.it is my strong belief that maintaining as healthy an environment possible is of utmost priority.we ALL have children and grandchildren whose future is in OUR hands! • Mercury is a scientifically proven risk to children's health and its emissions need to be regulate immediately. • Our children are not a political bargaining chip. Reducing harmful pollution to protect our descendents is common sense and necessary for the survival of our species. • This nonsense of the Bush administration putting their (big-industry) supporters first, the health of American citizens, especialy children, second, and the environment dead last has got to stop. This is beyond blatant and into the realm of the absurd. • President Bush, I'm 8yrs. old if you love me and all the rest of us children you will protect us from factory polution, not help them to kill us. • Cut mercury pollution and save our kids. You should have to try teaching brain-damaged kids! Or being their parents! They are our future. • There are many children in our family, and we worry that the EPA is taking decisions that may profoundly affect their health, just to accommodate greedy but irresponsible corporate constituencies. • Each year, many children are born with high levels of mercury in their bloodstreams and this high level of mercury can lead to serious brain damage. I think it is time we realize the faults of our inhumane decisions and take responsibility for the health of future generations. • Children are a nation's greatest resource. Mercury has been proven to be harmful to humans. We need to protect our children. • To protect our most sacred investment in the future, our children. • Our children are our future, please protect them from Mercury. With the lives that are at stake, have mercy on the children. • Given that you have no compunction about dropping bombs on children it comes as no surprise that you could care less about children in our own country that are effected by mercury poisoning. • EPA, plz for the sake of our children! have the power plts d!reduce mercury asap. • I demand responsible action for our children's sake. If you are really a Christian please think of something else other than you and your friends pocket books. • Please put the health of our children and grandchildren first, before industry profits. If we can't do this, we are truly morally bankrupt.

Appendix C (continued)
Sample Verbatim Passages from Salient Sub Codes
Drawn from the 173 Total Quotations Coded "Unique Text in a Form Letter"

Insults (Definition: Any text that employs derisive rhetoric or direct insults)

Our environment is at a critical state and I am sick and tired of these idiots running the show and ruining everything on this planet. • Why don't you chew on an old thermometer for a while and see what ingesting mercury will do for you. No? You're too good for that? • Is this part of George Weasel Bush's "leave no child left unpoisoned" campaign? • Perhaps it is too late to prevent brain damage in some of our population, as seems to be evident in some of our "leaders", but let's do all that we can to prevent further damage to our children and grandchildren. • We only have one earth to live on, and frankly if we ever find that life is possible on Mars, I'd prefer that Bush and all his oil industry friends be sent as the first pioneers of that planet. • Where does the stupidity originate?? • Thank you for your diligent pursuit of Bush. He's seem hell-bent to ruin this world...all for the love of money. We need to get him out of the White House. He never earned the vote in the first place. • Dear Members of the EPA, If you all can't protect our environment from the idiots who are trying to destroy our planet then you all need to get different jobs! • As your own mother would tell you, "GROW UP!" • You asre filth! Damaging thousands of lives! • You all belong in the hottest corner of hell for eternity for your greed and unhealthful attitudes.

Shame (Definition: Any text that invokes shame)

This is shameful! • I demand responsible action for our children's sake. If you are really a Christian please think of something else other than you and your friends pocket books. • Is seems shamefull that dirty 19th century technology is allowed to exist simply because there is money to be made. • Your organization is a disgrace. Do your job and protect the _people_ _yourself_ _your family_! • I think it is a shame what the environmental agency has become under Bush. Shame!Shame! The mercury pollution by power plants is just one of many issues. • We have three beautiful children who mean more than life to us. Who do you represent when you lift legal limits of lethal substances....who PAYS the price for the greed???? • Please take seriously this threat to the health of our nation's most vulnerable citizens. If you don't protect them from this poisoning, who will? You have a responsibility to make a difference for the future of our country and your children's children as well, and if you live up to it you will be leaving behind a legacy to be proud of, not one to be ashamed of. • It's disgusting that you place the special interests of a handful of contributors over that of the health of hundreds of thousands of kids. What on earth is wrong with you people? • This administration should be ashamed of the way it abuses the environment. What kind of a world are we leaving behind for our children? If there is any moral decency in the EPA, then it should stand up and do the job it was created to do. Protect the environment. Before it's too late for our children. • It is unconscionable that the EPA wants to allow higher levels of mercury in our drinking water and air. What are you trying to do here? Shorten our live spans? Shame on you and the greedy Bush administration. You all belong in the hottest corner of hell for eternity for your greed and unhealthful attitudes.