

Group B -- Session 5 – June 4, 2004
The George Washington University – eRulemaking Workshop 2.0

M: Moderator

R: Respondents

M1: Define in any terms you feel are appropriate, your ideas of the benefits and the costs associated with eRulemaking.

R2: I think it depends upon who the constituency or participant is, what the costs and benefits would be. They could be different and even contradictory depending on who you are looking at. Potential benefits would be greater participation for some people and perhaps a larger, more diverse range of opinions. But then on the flipside, you could have simply a plethora of things. It could be unmanageable or it could just be a reinforcement of everyone saying the same thing with a lot of “me too”.

M1: I’d like to follow-up on the first part of your answer stating that different stakeholders will accrue different benefits and costs. For this particular group that we heard about today, can you think of any way in which we might build or encourage the building of a system that would be beneficial for the state and local officials?

R2: I found it very interesting that one of the presenters mentioned that they could find it daunting to do. But, I think that gets to the point of, the rulemaking process itself can be complex. It is certainly very procedural. And, all the technology in the world is not necessarily going to change the procedures. It is just going to make them more accessible in terms of not having to mail something in. You do it online, and people equate that with making it easier, but you still have to know the process. From that perspective, unless there is some way to make it easier to educate the people on the process, because I don’t think the process itself is going to change significantly, you could. There are reasons for those different procedures.

R3: A potential benefit would be greater participation, but also worried about the administrative burden that would be placed on the different agencies. One of our main issues is that it will streamline the process and enable the public a better understanding of how our administrative rulemaking process works, but at the same time, how you get all the agencies on board to do it the same way? If that is the goal, you want them all to work in the same fashion. I know that I’ve had conversations about the fact that EPA has taken the lead with developing Regulations.gov, and we have this one method or suggestion of how to operate the process. But everybody seems to think they have a better way of doing it. How do you get them all to come in together? And, if you do get them to come on together, and you have one central docket, who is going to be the caretaker of that whole thing?

M1: One of the fears that has been expressed in earlier workshops is that to meet the needs of different constituencies and agencies, the end result will be necessarily something that is actually tremendously simplified and watered down and doing very little but offending very

R5 also in sessions 1A (R2), 2B (R6), 3B (R4), 4A (R8).

few. Do you see any avenues around that based on what you've heard here or from other opportunities you've had to think about this problem?

R3: No. This is an issue I've only been looking at for a short while. I'm new to the committee. I guess I look at it from a different perspective. To be all things for all people, I think will make it end up being massive. And, how do you manage that?

M1: To be more massive, you are talking about creating a suite of options and people pick and choose from them, and how do they use them?

R4: Regarding your question, are you talking just about the docket system? You said "eRulemaking". My answer to your question is very different depending upon whether we are just talking about the Federal Docket System or the whole world.

M1: Let's break it down to first the narrow and then the broad.

R4: There is the obvious IT cost. I think ultimately those are lower than if we are developing thousands of different things all over the government and paying multiple licenses and so on, so there has got to be some negative costs and efficiencies there. There is a potential for both the docket, as well as the broader world of electronic rulemaking, that by centralizing the management of the evolution into a smaller organization, you have the potential to slow down some of the thousand flowers blooming. That is one of the management challenges, to make sure that you don't do that or that you at least address it and figures out a way to actually allow it to happen and foster it rather than ignore that it is happening.

M1: Could you define "a thousand flowers blooming" in this context?

R4: In the docket context?

M1: Yes.

R4: It may be less relevant than it is in the rulemaking process, because if you follow the train of thought you were just discussing, over the functional capabilities of the system, our goal, in part, is to be able to act in part as a service provider to agencies where they can choose which services to buy. If you are, in a sense, evolving version 2.5, 3.0 and version 4 of whatever this Federal Docket System is, you are looking for agencies that are testbeds for ideas; who create an idea, create a demand for service. This provides an entity that has the expertise and perhaps the funding channel to do something they otherwise would not have been able to do, particularly if they are a smaller agency did not have the skill sets and the IT shop internally to do it. One of the things we are looking forward to is the ability to, rather than in the docket world have a digital divide within the federal government with the big agencies who can afford to do their own little thing and lots of other people who can't, we are sort of technology transferring to the smaller agency or the one that didn't realize there was this need that they had or they had it and could never afford it. Then, act as a group of people that the larger agencies could say, "Yeah, I want to take charge of this particular group, to go off and run with some new functional capability." Look at the

R5 also in sessions 1A (R2), 2B (R6), 3B (R4), 4A (R8).

budget process for FY06. If you didn't see the Washington Post this morning, you are going to see that there are going to be battles over discretionary spending for the coming year. Well, one of the things we are finding is, if we can team up federal agency spending, I mean, all you need is you get a couple hundred thousand from us and a couple hundred thousand from somebody else and a couple hundred thousand from a federal agency. All of a sudden you have real money that no one agency could have afforded to do. I ultimately think that if we can get around the naysayers, who automatically think all the negatives, we will find positive, constructive ways of actually developing a docket that will do more than individual agencies would have been able to do on their own.

M1: Other benefits?

R4: I think ultimately that the whole issue of transformational activity is critically important to the docket. I think we'll be able to make faster rules. Independent of value to the rule maker and the technocrats that write the rules or the legal information, there is the external benefits to the American public of having a better sense, even if it is just the feel-good psychological benefit of knowing that they have expressed their view to the government. There is that whole outside world of, "It's my government, and I should have the right to tell it whatever I want to tell it." I think there are benefits to the research with the docket as a government-wide archive. We are back loading the docket as we get the time and money to do it. That you would not be able to do if you did not have electronic docket, and certainly you could not have done that kind of work if you didn't have the federal government-wide docket.

M1: Let me just follow up on your point about transformational activity. What are the agents for change for transformational activities in rulemaking more broadly rather than just electronic rulemaking? Is it individual actors who have points of influence and access, or is there something, can it be technologically driven? Who and or what are the agents of change?

R4: It is probably not much different than any other activity in government or in private companies. You've got people who are in the business process themselves, who have some kind of relatively unique capability to envision a different future than the one they are now involved in. Those people are there, relatively rare, but they are there. You can sort of spot them if you look around the world. If they also have some kind of ability to understand information technology, and they add that into their more future visionary capability, they exist. The other side has your IT people and CIO folks. In the CIO folks, you have this debate over, is the CIO running the computer system or is the CIO a significant agent of change at the board of directors of the company? If you think of that latter definition of the CIO roll, these are people that understand the implications of information technology for business processes. Their challenge is to translate it into the words of the business process owner and say, "See what this can do for you? Let's talk." Here, in the broad world of eRulemaking, both of those two types of people exist in the federal government. They are fairly limited, but the fact that the National Science Foundation has a digital government program, tells you these things are there. At my agency, we have a couple of very senior career people who do it. They were the drivers of

R5 also in sessions 1A (R2), 2B (R6), 3B (R4), 4A (R8).

the electronic docket, not the IT people. Those people are the most critical ones to win over and/or find and foster and drag them to a meeting and say, “You need to make the case to your fellow folks.”

R5: I don't think we can know very much right now about the costs or benefits. Even with eDockets, with the exception of a few people, we haven't even begun to think about the implications for process. We've mostly thought about the implications for technology. I think that there is a lot of cost. I think there is also a lot of benefit. I think it is really hard to predict, or even try and predict how that will come out. One of the things that were mentioned this morning, that I thought was really interesting, was that the people in Nebraska were working with EPA to get involved at an early stage of the process. I think when you start publicizing that is happening other people are going to demand to be involved at the early stage of the process too. I think that has a lot of potential to both increase costs as well as benefits. I think that it is going to turn out that, in order to not be mired in litigation afterwards, you are going to have to find some way to have a collaborative process between agencies and stakeholders that happens early. You are just going to have to find some way you can work through and sort out things to some degree before they start to talk about the formal rule. To me, that implies all kinds of transformation that I can't even begin to think about. But, the balance is that at the same time, I think agencies are getting poorer. I think lots of technical expertise is disappearing. I think the technology helps to balance that to some extent, but probably not entirely. So, when I try and think about this, there is a lot of stuff tied up with costs and benefits.

M1: I do know that NC is interested in getting more work done on how people could be brought in earlier. So, it could be that on your list of agents of change, you might want to add folks like him, the powerful academics, who can actually bring people together who understand what some of the levers are to pull. My follow-up with you is, if you had to pick one IT application that would enable the type of transformation you just talked about, what would it be? Would it be something that exists now, or would it have to be something that doesn't exist but could as a result of some development process?

R5: I don't feel as if I've even begun to touch the kinds of work that is going on with collaborative software. I don't know about anything that exists that really lets you deal with it the way you need to. I don't think you can involve the numbers of people geographically, who would need to be involved, to have a really collaborative process without using IT. But to what extent the stuff that exists now would be useful, I don't know.

R6: The benefits and costs are always going to depend upon the goals or outcomes you are looking for. In terms of what I am familiar with, I think knowledge of the rulemaking process is important. Because when they contact their Congressman after getting an alert from their association, as opposed to sending a comment to the rulemaking agency, it could also be an indicator that they don't really understand the process and that they need to comment to the agency and not their Congressman. It could be a combination of not wanting to contact the federal agency along with not really realizing what the process is.

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On one of the other reports, most of them weren't even aware of Bush's Executive Order; they had no idea it had even taken place or that there was a focus on this. So, I think education will be a cost that needs to be spent in the IT area as well as the actual benefit to them so that they understand it.

M1: My follow-up for you would be to ask, who would be the best people to do that? Neutral parties have been mentioned. People have asked whether directions would be posted as a part of the Federal Docket Management System; listing how to effectively participate in rulemaking and how to submit a good comment. Is it the federal government's job to explain to the other actors the best way to participate, or is this something that needs to devolve out to nongovernmental organizations and others outside of the federal government?

R6: It is hard to decide. If the federal government actually takes that step to explain what a good comment is and how the process works, it might be a step towards encouraging them to engage and also an acknowledgment that they are interested. Because, another comment in a couple of the reports is that they felt like they had put in a comment, but there was no response. They are not really interested in what they are saying. So, possibly, if the federal government came out and did it, it could take that step towards bridging that gap.

M1: Please share your thoughts on the costs and benefits associated with this transformation to eRulemaking.

R7: I have not had the chance to read our state reports, so I can't speak directly to those. But, my perception is that the balancing that [name - R6] talked about is important. What I appreciate, with what EPA and other federal agencies are doing, is funding either cooperative agreements, grants or contracts in order to have other groups serve as intermediaries to try and explore ways to reach small business and small communities to these kinds of things. Each of them, the small communities (i.e., small governments and their official representatives; elected or appointed), probably requires different techniques. In the sense, one of the reasons I think EPA supports our project is that our member institutions, in which there are 250 throughout the country, are in contact with local and state government units in those states they are located. So, you have the potential for outreach. I think in the future there may be potential for various kinds of training programs, virtual or otherwise, to engage some representatives of the small communities as mentors, perhaps, for other small communities. There may be some way through the engagement of entities, such as graduate programs at universities, or state-based associations, or the like. There may be different strategies for reaching different people. In terms of the costs-benefits of eRulemaking, I think they have been discussed. There are, benefits and the costs vary by constituency group. I think the whole issue of transparency is an extremely difficult one to balance. How you make it more transparent while retaining integrity of the process. If the federal government is always trying to out-finesse certain groups that can work the system, each of those efforts, by either outside groups or the federal government, brings them farther away from participation in the small communities.

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You are not having a digital divide, in that case you are having an increasing participation divide in terms of small communities.

R4: The full basket of things that happens in the lifecycle of writing a regulation includes lots of things that happen before the actual publication of the proposed rule. Everybody who lives inside the beltway already has access to influence the rulemaking process before the process have even really begun or at its various stages. Anybody who lives in this town has the ability and knowledge to affect the rulemaking process before the first stages of the proposed rule actually get out. So, in a sense it is not news, it is actually giving people an equal playing field. The other thing I would add is, I don't want to go too far off the deep end, but if we are successful, ten years from now, the level of disaffection from the federal government that is suggested by what [name - R6] was talking about, with respect to small towns and communities, should be a lot less. When we talked about, and the President talked about, creating a more citizen-centric government; the fact that we are using the graphic "We the People" on the Regulations.gov site is not accidental. One of our goals is to get the public more involved in government. And, we ought to be using information technology tools to realize that in a way that we haven't before.

R5: I think it is terrific that they are doing it; I just think that if the environmental and advocacy groups had heard that yesterday, they would say, "Fantastic! We want to do that too!"

M1: So, then, if we all agree that improving the rulemaking process is possibly one of the end results of digitizing it, as well as transforming it; what is at the top of your list for ways in which to do that, and how would you define "improved"? What is an improved process, and how does IT facilitate that improvement?

R3: I think that the easier access to the rulemaking process will help make citizens more involved. I think one of the tools I've heard about being used to teach the public is a little character with a tutorial system.

R4: That is an issue that has come up in several meetings. Someone from OMB Watch raised this issue, over the importance of letting people know and giving them the tools to understand what this, otherwise rather complex process is, both the formal and informal parts of how it operates. So I think one of the things we are going to try to do, and George Washington University summer interns might be an excellent source, is to start that process part of Regulations.gov; where we literally have "101 - What is Rulemaking?".

R3: And then once they understand that the portal is so much easier for citizens to get involved in.

M1: Just as an aside, I hope it is not a little paperclip that pops up. {Name - R4}, define improved rulemaking process.

R4: One preface comment: Very often, what federal agencies do with the content of the docket, they hire contractors or have their own staff go through the docket. They identify

R5 also in sessions 1A (R2), 2B (R6), 3B (R4), 4A (R8).

everything that is in the docket, and then they have their “Response to Comments” document. Quite often, because of the complexity of that document and the fact that it is on paper, it means the rule writers do often not use it, as much as they could or should.

M1: What is the “it”, the referent there?

R4: The use of that document.

M1: The full content of the docket.

R4: In other words, the docket summary materials, and the response to comments documents, that the agencies are required to do as part of the record, often aren’t used as much as they should. No surprise. People will read the content of a submission from the people you would likely suspect to be most involved and are giving them the information that meets the legal requirements of writing an answer. So, if the National Association of Drinking Water Providers submits comments, the rule writers writing drinking rules will read that in very great detail. So will the attorneys. If the Environmental Defense Fund sends in a comment on a drinking water rule, everybody in Washington knows they are the people who comment on drinking water rules. So, his comments are critical and are read. So, one of the important measures to me is that the value of the full content of the docket becomes more used. Used, not just because it meets the requirements of the technical analytical requirement, but if there are 100 thousand comments with 80% saying it is a bad idea and 20% saying it is a good idea, that information is useful to the agency communication staff. It is useful to the senior management. And, it is useful to the Congress. That kind of value of the information, in the current docket, isn’t being used today in many ways. So to me, that is an important improvement. There is timing. It is faster. Improved process to me is more transparent. And, in the broader sense of rulemaking, it is right now, within federal agencies, a nineteenth century paper-based process. The amount of IT tools brought to bear on how we write rules is very limited. We have tracking systems in some cases. Some agencies have more or less good records management or document management tools. But there are all sorts of information technology tools that could be brought to bare on the rulemaking process, and very few of them are in any kind of organized or government-wide fashion. There are implications of all of those in terms of speed. For an example, if an agency employee involved in the rulemaking work goes on vacation, the process stops for two weeks. Nobody knows who’s got the most recent comment copy of the draft preamble. Where is it? Where are they? How do you bring in somebody in a regional office who wants to participate? Right now they are on the phone at best. We shouldn’t have to be subject to those sorts of delays.

M1: So collaborative writing tools, document management tools. But would you include some of these human language technologies as important?

R4: To me, those are critical to making sense of the content of the docket. And, I would probably argue that there is some value of those tools, as well, in a different part of the rulemaking process. That is trying to make sense of, what could be for some rules, an

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overwhelming amount of information out there that is relevant to the regulatory decision itself.

M1: Instead of just slicing and dicing the comments from commenters, you could be slicing and dicing scientific studies and the underlying data in ways.

R4: We are developing a scientific portal for our science employees. We have all sorts of databases. How do we give our scientific employees access to it, and to make sense of it, and to give to them tools to research?

M1: And they probably don't all work well together.

R5: I think there is lots of potential for improvement in terms of all the public things, like participation and the broader group of people. I think IT does a lot in terms of letting citizens participate, but it requires all of the education and the process stuff that people have talked about. So, IT is only a small part of it. I think that it is interesting people have been talking about transparency being important for the public as well as within agencies. I think it is really important that agencies see what they are doing. That may turn out to be as important, or more so, than the public transparency. I think IT is the only way you can do those things, even the simple stuff like really good searches. Not necessarily across dockets, but, having a really good search capacity that gives you what you need and not too much else.

M1: So, for a rule writer, that would include statutory authorization, rules that may overlap. It would have a sort of crosscutting component to it.

R5: Perhaps, but, part of what I mean when I say "really good search engine", is I think once you start searching across dockets – now maybe for the rule writer that could be useful, maybe that is a nice topic for research – but for someone from the public to search across dockets for something when they don't know rather precisely what they are looking for, I think they are going to get so many hits that they are not going to be able to deal with it. So, it goes back to the education thing. But, I assume, it will be for people who are all the time using it professionally, it will be like Google is for me now. I don't like to read things without being able to search them.

R6: I would think that internally, you would have more information and history involving the court cases for different rules. Did they comment before hand?

R5: That is down the track. That is why we keep saying that you need continue with the electronic thing for all the stages. I think that has been one of the confusions, knowing exactly what is being developed now.

R7: Within the last five years, I have had two different positions, one was with an agency and the other for a Secretary, and in both cases I have struggled with the rulemaking process. What was said about the individual going on vacation is true. There is a system in place in the agencies, which is highly dependent upon individuals. EPA has done a lot more

R5 also in sessions 1A (R2), 2B (R6), 3B (R4), 4A (R8).

than any other agency to try and change the mindset, but an important consideration as you move to federal government-wide eRulemaking, is to somehow have this process for engaging, not only career employees but also political appointees, in what the objectives and goals of eRulemaking are, other than to put a system in place. There were a number of persons with whom I've worked whose emphasis and bottom line with eRulemaking was, "Get the system up". It wasn't a matter of, "Do we have kinds of participation in the process that we need?" So, I don't have a solution for that. I think it is an issue that has to be continually impressed upon, not only the groups themselves that may not have effective participation now, but also on the managers, political and career, in a number of the agencies.

M1: I think that is a good point. There is an analogue to the point made this morning about Regulations.gov being something that just got thrown up. Now we are learning from the feedback what they'd rather see and how it should change over time. There is an analogue to our research as well. When we throw stuff out, in whatever form, and then see how people chew on it and what they do with it; whether they play with it or ignore it, whether they take it seriously and incorporate it into their broader transformational vision, or whether it just withers away. I think what we see going on at the workshops, especially with the NGOs and maybe some of the eAdvocate firms as well that generate a lot of these form letters, is the very process of sitting down at this stage and having this discussion causes some transformation in their thinking and assumptions about what is possible and what is likely. Some of that results in increased gaming. One guy believed he had to stay three steps ahead to remain in business. For other people, I could see the goal of producing 100,000 form letters with the goal of 50 to 100 substantive, data-rich, legally defensible comments that really aid in the process of writing a rule that reflects the stakeholders' needs. If that happens over time, it is only going to happen because people, who don't normally talk to each other, talk to each other. This is more than just an academic exercise.

R2: I think the answer that we are looking for is both quantitative and qualitative, and we have to consider both. As a consequence of that, we have to first be very clear about what problems we are trying to solve or what our goals are. In the discussions, all kinds of different goals, problems, and objectives have been identified. So, I think in order to truly make an assessment of it, we have to be very clear and work from a very distinct list of what it is we are trying to achieve or fix. From that, our assessment would probably be very specific to that particular goal. You'd have to tailor it.

M1: You've been coming to these things for a while. What would you want to fix first?

R2: I think where you stand on an issue depends upon where you sit. I think the Virginia example was very interesting, in the sense that the presenter laid out a very specific set of goals they were trying to do that were driving the project. Some of them that he talked about were efficiency, transparency, and participation. So, I think that is really critical. To me, being able to really evaluate the content is very important. Getting truly substantive responses is also important. I think [name's - R4] earlier comment about simply having the opportunity to vent, even if it isn't an overly substantive input, is a very important goal. So, in some ways those two go past each other.

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So, on the one hand, we definitely want to have participation, but on the other hand we definitely want to have the opportunity for truly substantive input to get into the system.

M1: One of the most vehement opinions expressed by the stakeholders over the last couple of days is, that if you take out or remove our ability to vent through some technological means that would be the worst case scenario. Even when they have full recognition that the venting may not result in any substantive change in the formation of the rule or its implementation, the ability to vent and to know that the venting has been counted and publicized is an element of the transparency; is important to them and may serve a functional purpose within the broader system.

R4: It gets to recognition that writing regulations is more than just the statutory requirements or the agency's legal requirement under a court order, to issue a specific rule. In many ways it is more than that. It is a social phenomenon. It is lots of other things. If you begin to recognize that, then there is value in many different ways. In terms of tools to analyze the content of the docket, we've generally been talking about it only in the context of the public comments. But don't forget, there is a lot of other material in the docket. For the outside world, trying to make sense of the other content of the docket – the studies, the risk assessments, the risk characterizations, the other material – is probably one of the more daunting things for the outside world who want to do more than just submit a postcard. So, at some point along the line, one of the measures of success is, “Can we develop tools that help people make greater sense of that?”

R7: I think another issue, which I've heard come up, is the issue of whether or not it is worth commenting, because people don't know who else has commented. Some people have indicated that it might be helpful to have a system where periodically, throughout a comment period, there would be some sense of the kinds of comments submitted up to that point.

R4: Right. The current electronic dockets actually have close to real time, so that you can comment on the comment. One of the transformational things is, if you can create communities within the docket who are commenting and discussing and the agency is watching that discussion and maybe even seeding a question into it. That is a bit more transformational than the normal submitting of comments as if they were paper. The other thing I want to observe is the Module 2 of the project is a government-wide architecturally single system for the dockets tailored to agency's individual needs and uses. There isn't a single monolithic computer system for the rest of the rulemaking process. We are not envisioning anything close to that. The closest we might get is the dispersion across federal agencies of a particular tool for a portion of an agency process with document management or tracking. There is not a way anybody can create a monolithic box that helps manage individual agencies' entire processes.

M1: The Third Module, which is the information management tools the rule writer will have on their desktop, are optional. Different agencies will choose to use or not to use them. What you said about tools allowing you to know who has commented and to cut through the overwhelming number of documents, those are the kinds of things where Jamie's tools would be useful to people outside of government. You could identify people by their profession. We got feedback that you also might want to be able to cut through by the sector of the economy you are in. Someone who is in the printing industry told Jamie they would really

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like to know what all the other printers have said. If they come to a docket in the middle, he'd like to see whether the printers' point of view has been fully articulated. If he can see what all the printers have said, he wouldn't necessarily need to comment if their point of view is represented.

R7: An organization could provide a clearinghouse for collecting comments from its members and synthesizing them into a very helpful document. But, it might get counted as one submission. Contrast that with an organization stimulating all of its members to send in slightly modified letters which all add up. I think there is a great deal of ignorance in the smaller communities about what is more effective for us. Do we work outside the system entirely with our representatives in Congress? Do we work with a national association? Or do you really want us all to take time to write something and send it in?

R4: All of the above. The most successful person is the one that does all of the above.

R7: That is the challenge and why some of the small communities say, "We don't have the time."

M1: Where a stakeholder group or a sector of the economy has effective advocates who write good technically specific and well-honed comments for rulemaking (that's their job and mission); the sense I get from these focus groups is that they want to continue doing that. But they may use some of these IT tools to gather better information from their membership to do a better job of precisely that. Others do that but also still encourage their membership to send their own comments, because they may also be uncertain what the most effective way to engage is. Quite frankly, it may not be consistent across agencies or even within an agency, what a better way to approach this is. I don't think there are any clear-cut rules for what is the best strategy for engagement. Different sectors and different groups will engage in different ways, which is why you have to keep open as many avenues as possible, so that individuals or groups who want to go down one or both or all of those avenues will be able to do so without being impeded.

R4: With respect to third parties, maybe a way you can get at some of the concern over a small entity saying, "It is just overwhelming, and we don't know what to do," can be addressed with the following example. I'm pretty sure we're not going to do it in Version 1. But, if you had a way of creating a model that you can essentially host in your electronic docket, or it could be downloaded as an attachment, whatever it is; you are able to host a model that has a relatively simple set of inputs you can put in. That, through what is called web services, allows a third party's web site to put that model's inputs lines up on their web site, with their graphics and their color, so that they can for their members suggest, "See what happens to the agency's proposed decision if you change the default settings the agency used from 'this' to 'this'; Here is what the outcome standard changes to be"; or "We suggest you use our defaults and see what happens." All of that is essentially in the web services. It is basically driving it from our computers to theirs. The user doesn't have to know that. There are things like that we can do to help that third party entity to better understand what is going on. That to me is a bit more on the transformational side.

M1: Would anyone like to get a last word in before we break for lunch?

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