



May 30, 2023

Administrator Richard Revesz  
Office of Information and Regulatory Affairs  
Office of Management and Budget  
Executive Office of the President  
1600 Pennsylvania Ave NW  
Washington, DC 20500

*Submitted via Regulations.gov*

RE: Comment Extension Request, OMB-2022-0014

### **Comment Extension Request of the Competitive Enterprise Institute (CEI)**

Dear Administrator Revesz:

The Competitive Enterprise Institute (CEI) respectfully requests that the Office of Information and Regulatory Affairs (OIRA) extend the comment period by at least 60 days for its “Request for Comments on Proposed OMB Circular No. A-4, ‘Regulatory Analysis.’”

The notice of the proposed Circular and the accompanying preamble was published in the *Federal Register* on April 7, 2023, providing the public only 60 days to submit feedback. Given the complexity and importance of the issues contained within the Circular, this is far too little time. This document does not merely affect a single agency, but will inform regulatory analysis across the entire federal government.

The existing Circular A-4 is 48 pages.<sup>1</sup> The proposed Circular is nearly double the length at 91 pages. The presentment of the material also complicates matters. Simply reading the new Circular in isolation is insufficient because cross-referencing changes with the existing Circular is necessary. The preamble helps to ease this process some, but it is still difficult to track the changes that are being made even with the preamble.

There is no “marked-up” version of the existing Circular A-4 to show deletions and additions. Even if there were, the public would still need to review an explanation of the rationale for the

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<sup>1</sup> Office of Mgmt. & Budget, Exec. Office of the President, Circular A-4, Regulatory Analysis (Sept. 17, 2003), [https://www.whitehouse.gov/wp-content/uploads/legacy\\_drupal\\_files/omb/circulars/A4/a-4.pdf](https://www.whitehouse.gov/wp-content/uploads/legacy_drupal_files/omb/circulars/A4/a-4.pdf) (accessed May 30, 2023).

changes (as the preamble tries to provide), many of which include proposed regulatory analysis that is significantly different from existing practice.

An additional 60 days to submit comments will help the public, but more importantly, it will help OIRA by providing it more robust feedback. Further, there is no deadline or any reason to rush this process.

We appreciate this opportunity to make this extension request and look forward to submitting written comments on the specific changes within the proposed Circular A-4.

Sincerely,

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