

Hull, Kevin@OAL

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**From:** Tim Morgan <tmorgan@eaap.ca.gov>  
**Sent:** Wednesday, December 03, 2014 4:31 PM  
**To:** OAL CCR Contract  
**Subject:** CCR Contract

Eight or Nine years ago my former coworker Carolyn Pirillo and I wrote only somewhat tongue in cheek "anybody but West's." Ah, but we live in an age of monopoly power.

I have two suggestions:

1. The old Barclay's version left more procedural history in notes under regulations, such as previous versions of the same reg. and agency contact persons. The loss of this information was unfortunate.
2. The Code of Federal Regulations allows one to read versions of federal regulations in effect in each of several years. That would be a significant enhancement. To my understanding, unless one keeps copies of old regulations, retracing steps to earlier versions requires difficult browsing through the California Notice Register, which I don't think has ever been put on line for search purposes.

Good luck,

Tim Morgan

Hull, Kevin@OAL

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**From:** Osborn, Susan@DCSS <Susan.Osborn@dcss.ca.gov>  
**Sent:** Friday, December 05, 2014 1:07 PM  
**To:** OAL CCR Contract  
**Cc:** Shanaberger, Debra@DCSS; Brown, Janelle@DCSS  
**Subject:** OAL CCR Contract - Request for Information

Hello Kevin,

Question:

Does the phrase "inviting the submission of information relating to the development or maintenance of online searchable reference material" include a request for suggestions for improving the ease of use of CCRs, such as adding search features and making data more accessible?

Thank you.

*Susan M. Osborn*, Ph.D., M.S.W.  
Manager: Policy, Procedure Manuals,  
& Regulations  
Program Management Section  
Policy & Program Branch  
CA Dept. of Child Support Services  
(916) 464-5062

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RECEIVED  
JAN 15 2015  
STATE OF CALIFORNIA  
OFFICE OF  
ADMINISTRATIVE LAW

CALIFORNIA ASSOCIATION OF REALTORS®

January 14, 2015

Office of Administrative Law  
ATTN: Kevin D. Hull  
300 Capitol Mall, Suit 1250  
Sacramento, CA 95814  
Email: CCRcontract@oal.ca.gov

**RE: OAL REQUEST FOR INFORMATION REGARDING PUBLICATION OF THE OFFICIAL CALIFORNIA CODE OF REGULATIONS AND THE CALIFORNIA REGULATORY NOTICE REGISTER**

Dear Mr. Hull,

Thank you for the opportunity to provide comments related to the publication and distribution of the California Regulatory Notice Register (Notice Register). The CALIFORNIA ASSOCIATION OF REALTORS® (C.A.R.) seeks to be a resource to the Office of Administrative Law (OAL) as it develops its upcoming contract proposal related to the future publication of the Notice Register. C.A.R. is very encouraged that the office is seeking input from interested parties related to the development and maintenance of online searchable reference material.

C.A.R. requests that OAL, in its efforts to establish parameters for the future contracting of the Notice Register, consider simplifying the regulatory notice process by establishing a central repository within its existing website to provide notice for ALL rulemaking activity. Put simply, OAL should encourage all state agencies to submit notices to OAL related to pre-rulemaking activity for publication in their Notice Register 15 days prior to any scheduled meeting seeking to establish, research or consider future regulatory changes.

In an effort to encourage citizen participation, OAL should make every effort to make the Register available in a usable and searchable web based format complete with an email subscription notification service.

In fact, agencies, boards and commissions are already required to post all meeting information and notices to their respective websites; C.A.R. is simply requesting that these notices also be re-posted within OAL's Notice Register. OAL should also consider permitting state agency staff to electronically submit Notice Register content, which would serve to streamline the production of the Notice Register and reduce the time pressure placed on state staff resources, who currently are required to hand deliver hard copies of the content placed in the Notice Register.

While C.A.R. is aware that the publisher pays the state compensation for the exclusive right to publish the Notice Register, it may be necessary at this juncture for OAL to consider an alternate means of publication for this invaluable resource. We suggest, that should the state no longer receive such royalties, that OAL instead consider recapturing the actual costs associated with the maintenance,



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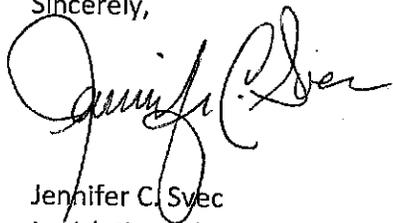
New York, North Carolina, North Dakota, Ohio, Oregon, Pennsylvania, Rhode Island, South Carolina, South Dakota, Tennessee, Texas, Utah, Vermont, Virginia, Washington, West Virginia and Wisconsin) offer some kind of subscription service to state agency rulemaking through their regulatory oversight body (the equivalent to California's Office of Administrative Law).

Following the federal regulatory notice model uses strategies that have already proven to be useful and cost effective. C.A.R. strongly urges OAL to consider changes the states Notice Register to more closely follow the Federal Notice Register as it will only serve to create transparency and promote participation by giving the public one uniform usable source in which to access agency meeting information.

The CALIFORNIA ASSOCIATION OF REALTORS® requests to be added to the "CCR Contract Distribution List" in order to be included in OAL's discussions surrounding the publication and distribution of the Notice Register. All communications related to this proposal can be directed to Jennifer Svec who may be reached at (916) 492-5200 or via email at [jennifers@car.org](mailto:jennifers@car.org).

The CALIFORNIA ASSOCIATION OF REALTORS® looks forward to working with the Office of Administrative Law and its staff in improving access to state resources and information surrounding regulatory policy development and implementation. Increasing the public's access to the regulatory development process is vital for the formation of sound policy that will achieve the states intended goals.

Sincerely,



Jennifer C. Svec  
Legislative Advocate  
CALIFORNIA ASSOCIATION OF REALTORS®

cc:

Senator Cathleen Galgiani  
Senator Anthony Cannella  
Senator Isadore Hall, III, Chair, Senate Committee on Governmental Organization  
Senator Tom Berryhill, Vice Chair, Senate Committee on Governmental Organization  
Assemblyman Rudy Salas, Chair, Assembly Committee on Accountability and Administrative Review  
Assemblyman Rom Lackey, Vice Chair, Assembly Committee on Accountability and Administrative Review

**Hull, Kevin@OAL**

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**From:** Karim Drissi <karimd@car.org>  
**Sent:** Wednesday, January 14, 2015 4:56 PM  
**To:** OAL CCR Contract  
**Cc:** Jennifer Svec  
**Subject:** C.A.R. Comments re OAL Request for Information Regarding Publication of the CCR and the CA Regulatory Notice Register  
**Attachments:** C.A.R. Letter re OAL Request for Information Regarding Publication of the California Regulatory Notice Register.pdf  
**Importance:** High

Mr. Hull,

Jennifer Svec has request that I forward the attached comment letter to you. The California Association of REALTORS® is submitting these comments via email in response to the Office of Administrative Law's request for information regarding publication of the California Code of Regulations and the California Regulatory Notice Register (Register), which appeared in the December 5, 2014 edition of the Register. We greatly appreciate the opportunity to provide comments on this matter, and we look forward to continuing to be an active participant in this process. If we can be of any additional assistance, please do not hesitate to contact Jennifer at (916) 492-5200.

Sincerely,  
Karim Drissi

**Karim Drissi**  
Legislative Analyst  
California Association of REALTORS®  
1121 L Street, Suite 600  
Sacramento, CA 95814  
Phone: (916) 716-1601  
E-mail: [karimd@car.org](mailto:karimd@car.org)

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CALIFORNIA ASSOCIATION OF REALTORS®

January 14, 2015

Office of Administrative Law  
ATTN: Kevin D. Hull  
300 Capitol Mall, Sult 1250  
Sacramento, CA 95814  
Email: CCRcontract@oal.ca.gov

**RE: OAL REQUEST FOR INFORMATION REGARDING PUBLICATION OF THE OFFICIAL CALIFORNIA CODE OF REGULATIONS AND THE CALIFORNIA REGULATORY NOTICE REGISTER**

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C.A.R. requests that OAL, in its efforts to establish parameters for the future contracting of the Notice Register, consider simplifying the regulatory notice process by establishing a central repository within its existing website to provide notice for ALL rulemaking activity. Put simply, OAL should encourage all state agencies to submit notices to OAL related to pre-rulemaking activity for publication in their Notice Register 15 days prior to any scheduled meeting seeking to establish, research or consider future regulatory changes.

In an effort to encourage citizen participation, OAL should make every effort to make the Register available in a usable and searchable web based format complete with an email subscription notification service.

In fact, agencies, boards and commissions are already required to post all meeting information and notices to their respective websites; C.A.R. is simply requesting that these notices also be re-posted within OAL's Notice Register. OAL should also consider permitting state agency staff to electronically submit Notice Register content, which would serve to streamline the production of the Notice Register and reduce the time pressure placed on state staff resources, who currently are required to hand deliver hard copies of the content placed in the Notice Register.

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publication and distribution of the Notice Register by: (1) requiring agencies, boards and commissions submitting notices to pay for the actual costs associated with processing notices for publication; and, (2) charging a subscription fee to members of the public, not to exceed \$2,400 per year, adjusted annually based on the consumer price index, to recover the actual costs associated with the publication of the Notice Register.

Providing the public with a universal location to locate Agency meeting notices would increase citizen participation and assist Agencies in locating all interested parties, thus, providing more thoughtful public policy discussions and creating more effective regulations.

### **Current notice requirements in California**

Current state law requires State agencies to provide at least 45 day notice (formal rulemaking) to interested parties prior to the close of the public comment period and adoption, amendment or repeal of the regulation. State agencies are only required to notice a hearing of formal rule adoption in the Notice Register. State agencies are not required to provide notice in the Notice Register for informational hearings, workshops and stakeholder meetings, but may do so voluntarily. Unfortunately for the public, it is often in these less formal meetings where the actual agenda or roadmap for the regulation is determined.

More and more regulation development occurs during proposed rulemaking meetings, hearings, workshops and scoping hearings. The activities are only noticed on individual Agency websites; forcing citizens to navigate over 200 agency websites for daily updates on these activities.

### **Current federal notice requirements**

Unlike California's Administrative Procedures Act (APA), the Federal Administrative Procedures Act requires Federal Agencies to publish, in a centralized website, ALL proposed rules, final rules, public notices, Presidential actions, and notices of proposed rulemaking (NPRM) activities to interested parties in the Federal Register. For 20 years, the Federal Register has been statutorily required to be maintained in an electronic format permitting the public to access its contents online. Furthermore, on January 21, 2009 President Obama signed a Memorandum known as "Transparency and Open Government" that called upon Executive Departments and Agencies to, among other things, "... harness new technologies to put information about their operations and decisions online and readily available to the public." This Memorandum resulted in the Office of the Federal Register in coordination with the Government Printing Office, establishing an electronically searchable and subscribable Federal Register (FR2.0) which was released in the summer of 2010.

### **How does California's notice practices compare to other states?**

In March 2014, C.A.R. conducted an extensive evaluation of all 50 states' rulemaking websites, notices, calendars and documents that are managed and maintained by their APA oversight bodies. We have uncovered the following: 24 other states (Alaska, Arkansas, Connecticut, Florida, Indiana, Iowa, Kentucky, Minnesota, Mississippi, Missouri, Montana, Nebraska, New Jersey, New York, Ohio, Oklahoma, Pennsylvania, Rhode Island, South Dakota, Tennessee, Texas, Vermont, Washington and Wyoming) already have a single searchable database to access all proposed state agency regulations; 12 states (Arizona, Arkansas, Delaware, Florida, Idaho, Indiana, Kansas, Minnesota, New Jersey, Virginia, Washington and West Virginia) offer a central location for pre-rulemaking notices; and 37 states (Alaska, Arizona, Arkansas, Colorado, Connecticut, Delaware, Florida, Georgia, Hawaii, Idaho, Illinois, Kansas, Kentucky, Louisiana, Maryland, Massachusetts, Missouri, Montana, Nebraska, New Hampshire,

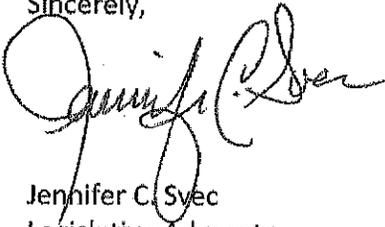
New York, North Carolina, North Dakota, Ohio, Oregon, Pennsylvania, Rhode Island, South Carolina, South Dakota, Tennessee, Texas, Utah, Vermont, Virginia, Washington, West Virginia and Wisconsin) offer some kind of subscription service to state agency rulemaking through their regulatory oversight body (the equivalent to California's Office of Administrative Law).

Following the federal regulatory notice model uses strategies that have already proven to be useful and cost effective. C.A.R. strongly urges OAL to consider changes the states Notice Register to more closely follow the Federal Notice Register as it will only serve to create transparency and promote participation by giving the public one uniform usable source in which to access agency meeting information.

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Sincerely,



Jennifer C. Svec  
Legislative Advocate  
CALIFORNIA ASSOCIATION OF REALTORS®

cc:

Senator Cathleen Galgiani  
Senator Anthony Cannella  
Senator Isadore Hall, III, Chair, Senate Committee on Governmental Organization  
Senator Tom Berryhill, Vice Chair, Senate Committee on Governmental Organization  
Assemblyman Rudy Salas, Chair, Assembly Committee on Accountability and Administrative Review  
Assemblyman Rom Lackey, Vice Chair, Assembly Committee on Accountability and Administrative Review

STATE CAPITOL  
ROOM 2059  
SACRAMENTO, CA 95814  
TEL (916) 651-4005  
FAX (916) 651-4905

STOCKTON DISTRICT OFFICE  
31 EAST CHANNEL STREET  
SUITE 440  
STOCKTON, CA 95202  
TEL (209) 948-7930  
FAX (209) 948-7993

# California State Senate

SENATOR  
CATHLEEN GALGIANI  
FIFTH SENATE DISTRICT



STANDING COMMITTEES

AGRICULTURE  
CHAIR

BUSINESS, PROFESSIONS &  
ECONOMIC DEVELOPMENT

GOVERNMENTAL  
ORGANIZATION

TRANSPORTATION &  
HOUSING

January 26, 2015

Office of Administrative Law  
ATTN: Kevin D. Hull  
300 Capitol Mall, Suit 1250  
Sacramento, CA 95814

**RE: OAL REQUEST FOR INFORMATION REGARDING PUBLICATION OF THE OFFICIAL CALIFORNIA CODE OF REGULATIONS AND THE CALIFORNIA REGULATORY NOTICE REGISTER**

Dear Mr. Hull,

I am writing in response to your request to provide comments related to the publication and distribution of the California Regulatory Notice Register (Notice Register). I am encouraged that the office is seeking input from interested parties related to the development and maintenance of online searchable reference material.

I am requesting that OAL, in its efforts to establish parameters for the future contracting of the Notice Register, consider simplifying the regulatory notice process by establishing a central repository within its existing website to provide notice for ALL rulemaking activity. OAL should encourage all state agencies to submit notices to OAL related to pre-rulemaking activity for publication in their Notice Register 15 days prior to any scheduled meeting seeking to establish, research or consider future regulatory changes.

In an effort to encourage citizen participation, OAL should make every effort to make the Register available in a usable and searchable web based format complete with an email subscription notification service. As a point of reference, I introduced legislation, SB 1091 (2014) which sought to give the citizens of California an opportunity to participate in the states regulatory development process by creating a web-based searchable Regulatory Notice Register. SB 1091 would have facilitated the core principles of the Administrative Procedures Act by providing the public with a meaningful opportunity to participate in the development of state regulations and would have brought California's notice process into the 21<sup>st</sup> Century.

Current law requires boards and commissions to post all meeting information and notices to their respective websites; these notices should also be re-posted within OAL's Notice Register. OAL should also consider permitting state agency staff to electronically submit Notice Register content, which would serve to streamline the production of the Notice Register and reduce the time pressure placed on state staff resources, who currently are required to hand deliver hard copies of the content placed in the Notice Register.

It is my goal to provide government transparency to all Californians as well as increase citizen participation in the regulatory process thus providing more thoughtful public policy discussions and creating more effective regulations.

Thank you,

A handwritten signature in cursive script that reads "Cathleen Galgiani".

Cathleen Galgiani  
State Senator, 5<sup>th</sup> District

January 29, 2015

2015 FEB -2 PM 12:59  
OFFICE OF  
ADMINISTRATIVE LAW

Office of Administrative Law  
ATTN: Kevin D. Hull  
300 Capitol Mall, Suite 1250  
Sacramento, CA 95814

Dear Mr. Hull:

On behalf of LexisNexis, I am responding to the Request for Information Regarding Publication of the Official California Code of Regulations and the California Regulatory Notice Register (CCR). LexisNexis carefully examined the opportunity to bid on these publications in 2005 and again in 2010. We met with Office of Administrative Law (OAL) staff both times prior to the issuing of the RFPs. We met with them in order to gain an in-depth knowledge of the publication processes and the challenges facing a commercial publisher taking over from the firmly established incumbent publisher. We did submit a bid in 2005 that was unsuccessful. Although we thoroughly examined the opportunity again in 2010, we declined to bid. We felt the risks inherent in the opportunity, both specific to the CCR and to Administrative Code publishing in general, were too great given the lack of information which would allow a non-incumbent commercial publisher to make a fully informed decision about the commercial value and viability of this opportunity.

As further outlined below, it is in our view critical to provide more complete information in the upcoming RFP. This will allow *all* potential bidders to fully evaluate this opportunity thereby guaranteeing full and fair competition between publishers, which will ultimately benefit both the users of the CCR and California's tax payers.

It would be helpful if the RFP included the State's vision for the future of the CCR. For example, it would be helpful if the OAL specified if it anticipates changing the publishing model, such as going to an online- first model, during the term of the next contract. Administrative Codes are typically high cost publications and there is generally declining print revenue. We would appreciate having a five year history of the subscriber numbers and pricing for the main CCR publication and the slice publications. This will allow potential bidders to conduct a meaningful and informed financial analysis.

The official CCR has become synonymous with the Barclays brand in the marketplace. The publication is titled Barclays Official California Code of Regulations and is regularly referred to simply as "Barclays." This is a significant hurdle for a new publisher to overcome and we would like assurances that the OAL will support a new publisher through the transition period and beyond. One way of accomplishing this is to give a new publisher the *exclusive* use of full subscriber lists to both the CCR and the slice publications. All subscribers should be notified directly by the OAL of the change of publishers of the Official CCR. The importance of continuing to subscribe to the Official CCR should be stressed. This would help even the playing field if the current incumbent publisher chooses to publish proprietary, competing publications. A non-compete agreement with the current incumbent publisher of at least a year would be ideal.

A final of concern is the recent General Assembly's AB292 and its potential impact on the OAL and on the publication contract. While the governor ultimately vetoed the legislation, the political landscape is uncertain on this issue. We believe that this uncertainty should be fully addressed in the next contract. The last two contract amendments reserved the right of the Parties to "renegotiate if the passage of AB 292, or other similar legislation, impacts or alters the rights provided or responsibilities required under the California Code of Regulations publication contract." We suggest that the next contract should also include a termination option in the event of loss of rights provided under the contract, such as loss of exclusivity.

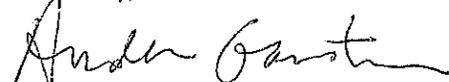
We appreciate the opportunity to respond to the RFI. Please add LexisNexis to the CCR Contract Distribution list for further communications. The direct contact information for this purpose is:

Nikki Daugherty  
LexisNexis  
701 E. Water Street  
Charlottesville, VA 22911

Email: [nikki.daugherty@lexisnexis.com](mailto:nikki.daugherty@lexisnexis.com)  
Mobile: 434.242.1049

We look forward to continuing the conversation.

Sincerely,

  
Anders Ganten  
Senior Director, Gov't Content

**Hull, Kevin@OAL**

---

**From:** Daugherty, Nikki (LNG-CHO) <nikki.daugherty@lexisnexis.com>  
**Sent:** Thursday, January 29, 2015 9:23 AM  
**To:** OAL CCR Contract  
**Subject:** LexisNexis Response to RFI Regarding Publication of the Official California Code of Regulations and the California Regulatory Notice Register  
**Attachments:** LN Response to RFI regarding CCR publication.pdf

Kevin: Here is a PDF of the LexisNexis response to the RFI regarding the CCR. I will send hard copy via Fed Ex 2-day today

Appreciated the opportunity to respond.

~ Nikki Daugherty

Nikki L. Daugherty  
LexisNexis  
Director, Government Content  
701 E. Water St.  
Charlottesville, VA 22902  
434.242.1049

January 29, 2015

Office of Administrative Law  
ATTN: Kevin D. Hull  
300 Capitol Mall, Suite 1250  
Sacramento, CA 95814

Dear Mr. Hull:

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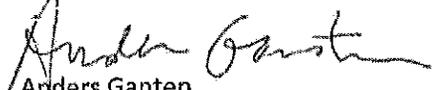
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Email: [nikki.daugherty@lexisnexis.com](mailto:nikki.daugherty@lexisnexis.com)  
Mobile: 434.242.1049

We look forward to continuing the conversation.

Sincerely,

  
Anders Ganten  
Senior Director, Gov't Content

**Hull, Kevin@OAL**

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**From:** cliff <cliff@eregulations.us>  
**Sent:** Monday, February 02, 2015 8:13 PM  
**To:** OAL CCR Contract  
**Subject:** RE: REQUEST FOR INFORMATION BY THE CALIFORNIA OFFICE OF ADMINISTRATIVE LAW  
**Attachments:** CA Request.docx

Dear Kevin

Thank you for the opportunity to respond to OAL's Request for Information Regarding Publication of the Official California Code of Regulations and the California Regulatory Notice Register. Please find our response attached.

Sincerely,

Cliff Li  
eRegulations.us  
954-233-0000 x 254

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**From:** OAL CCR Contract [mailto:CCRContract@OAL.ca.gov]  
**Sent:** Wednesday, December 03, 2014 6:32 PM  
**To:** OAL CCR Contract  
**Subject:** REQUEST FOR INFORMATION BY THE CALIFORNIA OFFICE OF ADMINISTRATIVE LAW

The Office of Administrative Law (OAL) is responsible for compiling and publishing the Official California Code of Regulations (CCR) and the California Regulatory Notice Register (Notice Register), both in hardcopy and online. The current contract for publication of the CCR and Notice Register ends on December 31, 2015. OAL is now issuing a request for information, inviting all interested persons to provide information or suggestions that may assist OAL in contracting for the future publication of the CCR and Notice Register. The deadline to respond is February 2, 2015. The complete request for information is attached hereto.

Response to Request for Information Regarding Publication of the Official  
California Code of Regulations and the California Regulatory Notice Register

CommerNet Inc, established in 1997 in Florida leads the nation in the design and implementation of online regulation and register services in three state level e-rule systems. A multiphase development over nine years of the Florida Administrative Code and Register ([www.FLRules.org](http://www.FLRules.org)) under the Florida Department of State brings an online searchable Administrative Code and Register with materials incorporated by reference and an entirely automated e-filing system for 400+ state local agencies e-filing with 800+ users. The State of Montana's [www.MTRules.org](http://www.MTRules.org) and District of Columbia [www.DCRegs.dc.gov](http://www.DCRegs.dc.gov) were also developed.

E-Regulations, a subsidiary, has started a new project to make every federal, state, county and municipal government's regulations, laws, and court cases available to all citizens. These unofficial versions are presented in the unified interface on [www.eRegulations.us](http://www.eRegulations.us), [www.eLaws.us](http://www.eLaws.us) and [www.eCases.us](http://www.eCases.us).

Three proposed models to consider for the California Code of Regulations and the California Regulatory Notice Register:

1. Florida Department of State and CommerNet have agreed to grant permission to another state through an Interstate Compact to acquire and to build on Florida's computer code and application platform including code, register, e-reference materials and e-filing system. This policy enables another state to build a similar but customized system to meet their needs.
2. Currently an unofficial searchable version of California Code of Regulations is available on the portal <http://ca.eRegulations.us/code>. The e-Regulations' dashboard could be used by OAL to manage the California Code of Regulations and the California Regulatory Notice Register in a SAAS (software as a service) model. An agency e-filing system as well as searchable incorporated by reference materials could be added in a later phase.
3. A total customized system based on California's specific needs could be developed.

Please add my contact information to the CCR distribution list.

For further information contact:

Cliff Li

CEO, CommerNet, Inc.

954-233-0000 x 254

[cliff@eRegulations.us](mailto:cliff@eRegulations.us)

**Hull, Kevin@OAL**

---

**From:** Brown, Janelle@DCSS <Janelle.Brown@dcss.ca.gov>  
**Sent:** Tuesday, February 03, 2015 11:37 AM  
**To:** OAL CCR Contract  
**Subject:** FW: RE: Request for Information Regarding Publication of the Official CCR and the CA Regulatory Notice Register

Dear Mr. Hull,

We would like to thank you for the opportunity to provide comment on this matter. The California Department of Child Support Services has two suggestions that may assist the Office of Administrative Law in contracting for future publications of the CCR and Notice Register.

The first suggestion is to provide more hyperlinks that will enable the user to drill down to a specific section within the CCR title, applicable division, and specific regulation. By increasing the number of available hyperlinks, the time it takes to locate a regulation will be reduced. Additionally, links to specific sections in the CCR can be utilized in written material for easy reference.

The second suggestion is to provide a search feature that would allow users to select "CTRL F" to access relevant content in the CCRs. Relevant content may be located in different regulations. Given the current procedure, users have to know, in advance, where relevant content is located in order to find it.

We apologize in for submitting our response one day after your requested due date. If you have any questions regarding this matter, please contact the Policy and Program Branch at (916) 464-5883.

Sincerely,

*Janelle Brown*

*Regulations Coordinator*

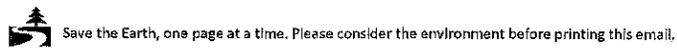
*Policy, Procedure Manuals, & Regulations Unit  
Program Management Section*

*Policy & Program Branch  
CA Department of Child Support Services  
Phone (916) 464-6855  
[janelle.brown@dcss.ca.gov](mailto:janelle.brown@dcss.ca.gov)*

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Hull, Kevin@OAL

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**From:** Michael Colin Lindsey <mlindsey@law.berkeley.edu>  
**Sent:** Thursday, February 05, 2015 1:22 PM  
**To:** OAL CCR Contract  
**Subject:** future publication of CCR and Notice Register

This letter is in regard to the publication of the Official California Code of Regulations and the California Regulatory Notice Register.

It is crucial that the next publisher of this material produce materials in accordance with contemporary standards for open and linked data. Increasingly, innovators are able to use data to build new services and outreach in ways that traditional publishers can not foresee. Therefore, I recommend that we think of "publishing" less as being about three-ring binders, but rather as the process of making the CCR and Notice Register available in ways that can be read by machines--citizens, governments, institutions writing applications that can read and understand this data en mass. Work has been proceeding apace in this area in government for years, and standards have emerged to ensure information of this type is re-usable for the most applications--specifically, as structured XML data. Akoma Ntoso is a global standard with major institutional backing and worldwide usage. There are others, but this is the one I recommend.

In summary, as a librarian at UC Berkeley, **I recommend choosing a publisher who can ensure that the CCR and Notice Register will be openly available as bulk structured XML data, using preferably the Akoma Ntoso standard.**

I believe that this is an incredibly important decision for our state. I am available to discuss this matter further at 510-643-2948.

Thank you,  
Michael Colin Lindsey  
Law Library  
University of California  
Berkeley, CA 94720-7210