

Comment On A Proposed Rule

a public comment submitted to a federal rulemaking docket, checked against what the submitter's own file supports | Marked-up specimen

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A comment that asks for nothing in particular, sourced to a figure the file does not hold, rewritten to say what it wants and why.

ORIGINAL, WITH EDITS MARKED

SPECIMEN, PREPARED BY EDITFAST FOR ILLUSTRATION. NOT A REAL SUBMISSION.

Prepared for Cobbett Fabricating (fictitious), comment on a proposed rule

EXTRACT FROM THE SUBMITTER'S FILE (reproduced unchanged in both panels)

SF-1 Docket identifier given in the notice of proposed rulemaking: AGY-2026-0114. The comment period closes on a date stated in the notice.

SF-2 The company operates two plants and employs 41 people.

SF-3 Internal timing study, dated March 2026: the proposed inspection step adds 19 minutes per unit at the Fairview plant.

SF-4 The company has no figure for the cost across the industry and has commissioned none.

SF-5 The change the company wants: the inspection interval in proposed section 12(c) set at every fifth unit rather than every unit.

SF-6 The company has not decided whether to ask the agency to withdraw the rule.

COMMENT

We oppose this rule. It will be very costly for small manufacturers like us and industry-wide the burden will run to millions.¹

The inspection requirement is unreasonable and should be reconsidered.² We have been in business for thirty-one years and have never had a safety incident.³

We urge the agency to do the right thing.⁴

WHAT CHANGED, AND WHY

#	Was	Now	Reason
1	We oppose this rule. It will be very costly for small manufacturers like us and industry-wide the burden will run to millions.	Docket AGY-2026-0114. Comment of Cobbett Fabricating, a manufacturer operating two plants and employing 41 people. / [Query to the submitter: the draft said the burden would run to millions industry-wide. SF-4 records no such figure and none commissioned, so the sentence has been left out rather than softened. SF-6 records no decision on whether to ask for withdrawal, and nothing asking for it has been drafted.]	SF-1 gives the docket identifier the notice assigned, which the draft omitted, and SF-2 gives the facts about the submitter. The industry-wide figure is not in the file. A comment sits in the record as filed, and 5 U.S.C. 706 has a court review the parts of that record a party cites.
2	The inspection requirement is unreasonable and should be reconsidered.	This comment addresses the inspection interval in proposed section 12(c). We ask the agency to set that interval at every fifth unit rather than every unit.	SF-5 records the change the company wants, which the draft never stated. Paragraph 604(a)(2), where a final regulatory flexibility analysis is prepared, turns on issues raised in comments, so an issue is either identifiable on the page or it is not.
3	We have been in business for thirty-one years and have never had a safety incident.	Our timing study of March 2026 records that the proposed step adds 19 minutes per unit at our Fairview plant. We have not measured the effect at our second plant, and we hold no figure for the cost across the industry.	SF-3 gives a dated measurement the submitter holds. The years in business and the absence of incidents were not in the file as offered evidence of anything about this rule, and the sentence made no claim the agency could weigh.
4	We urge the agency to do the right thing.	(removed)	The sentence asks for nothing that can be granted or denied. What the submitter wants is now stated where the comment opens, from SF-5.