

**From:** Philip Brochman  
**To:** Michael Lesar  
**Date:** Tue, Jul 25, 2000 1:48 PM  
**Subject:** 75 day comment period

Mike, an urgent question.

I remember that the 75 day minimum comment period for a proposed rule flows from our (the U.S. Govt's) commitment under NAFTA to provide our international trading partners a reasonable opportunity to comment on a proposed rule.

Under what circumstances can this comment period be shortened? What level of approval is then required? For example, if the EDO is approving a rule as delegated by the Commission, can he then also shorten the comment period? Or would that kick the rule back to the Commission for consideration?

Thanks ...phil brochman, NMSS/SFPO

**CC:** Tim McGinty

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