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President Barack Obama
The White House
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Dear President Obama:

The New York City Bar Association (the “Association”) is a private, non-profit organization of more than 23,000 attorneys, judges, and law professors and is one of the oldest bar associations in the United States. The Association’s Committee on Animal Law (the “Committee”) regularly addresses legal issues involving non-human animals on a local, state, and national level. As we have in the past, this Committee welcomes the opportunity to submit recommendations for you to consider as you develop the Administration’s objectives for the second term.

A. INTRODUCTION

This letter summarizes positions that the Association has recently taken on Federal bills and rulemaking and an international treaty. The positions cover a broad range of concerns, including the welfare of animals, human health and safety, consumer protection, and the protection of endangered species. We hope that the Administration will adopt our recommendations on the specific issues discussed herein and, in regard to animal-related issues not mentioned in this letter, require executive agencies to give serious consideration to the interests of non-human animals whenever human activities have the potential to affect their lives.

B. COMMITTEE POSITIONS AND RECOMMENDATIONS

1. Recommendation on U.S. Positions at the CITES Convention in March 2013 Concerning African Elephants

We urge the Administration to adopt the recommendations concerning African elephants that are set forth in the Committee's letter of June 11, 2012 to Fish and Wildlife Service Director Daniel Ashe.¹ In the letter, the Committee recommends U.S. positions for the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) Conference of the Parties (CoP16) in March 2013 that are necessary to protect elephants from extinction due to the ivory trade.²

Our recommendations include the following:

- a. Following consultation with range states and other stakeholders, the United States should submit a joint proposal to include all elephants in Appendix I. (CITES prohibits international trade in specimens of species listed in Appendix I except when the purpose of the import is not commercial. Specimens of species listed in Appendix II may be traded, subject to restrictions.)
- b. The United States should oppose any proposals for the downlisting of elephant populations in any specific country or geographical area from CITES Appendix I to II and urge other parties not to submit proposals to allow trade in elephant ivory from the populations that are currently listed in Appendix II until such time as all African elephant populations are no longer under threat of extinction.
- c. The United States should oppose any proposal that would allow for the international trade or export of any raw ivory or worked ivory objects and amend the provision that currently allows for the export of worked ivory from Zimbabwe and ivory ekipas (carved ivory ornaments) from Namibia.
- d. The United States should urge the international community to provide funding for the African Elephant Action Plan through the African Elephant Fund (the multi-donor technical trust for the implementation of the African Elephant Action Plan) which was launched by CITES in 2011.

These recommendations will further the objectives announced by Secretary of State Hillary Clinton on November 8, 2012, in an address to the Partnership Against Wildlife Trafficking at the State Department. In order to quell poaching and trafficking in animals and

¹ The Committee submitted its letter in response to the request for public comment in 77 Federal Register 21798 (April 2012). The letter is *available at* <http://www2.nycbar.org/pdf/report/uploads/20072306-CommentletterinresponsetoUSFishandWildlifeproposedCITESamendments.pdf>. (Last visited January 17, 2013).

² Our recommendations are consistent with U.S. domestic policy. In 1989, the U.S. determined that trade in ivory threatened the continued existence of the African Elephant and banned the importation of ivory under the African Elephant Conservation Act, 16 U.S.C. §4201 *et seq.*

animal parts, she announced that there would be greater United States efforts to strengthen and expand international enforcement actions. The Secretary observed that illegal wildlife trafficking is a threat to United States' national security.

Illegal trade in animal parts and endangered species is ranked just behind illegal drugs in profits.³ Organized crime, militia groups, and terrorist groups have links to elephant poaching; ivory exploitation by these groups has supported the purchase of weapons and has fueled conflict and insecurity.⁴ Such groups often employ violent and dangerous methods to kill elephants, which put human populations at risk.⁵

History has shown that when African elephants are listed in CITES Appendix I, the trade in illegal ivory significantly decreases.⁶ Conversely, poaching increases when CITES permits some trade in elephant ivory by including African elephants in Appendix II. This is largely due to the fact that it is impossible for consumers to distinguish illegally poached ivory from legal ivory.⁷

The U.S. State Department estimates that raw ivory currently sells for \$400 per pound on average in the black market (prices vary according to country sold and quality).⁸ Because the value of ivory is so high, poachers have a strong incentive to kill elephants, including protected populations in preserves.⁹ Elephants are currently being killed across the African continent at the

³ Liana Sun Wyler & Pervaze A. Sheikh, CRS Report for Congress: International Illegal Trade in Wildlife: Threats and U.S. Policy 2 (Aug. 22, 2008), available at <http://fpc.state.gov/documents/organization/110404.pdf>. (Last visited January 17, 2013).

⁴ Testimony of Tom Cardamone, Managing Director, Global Financial Integrity, United States of America Senate Foreign Relations Committee Hearing 2 (May 24, 2012), available at http://www.foreign.senate.gov/imo/media/doc/Tom_Cardamone_Testimony.pdf. (Last visited January 17, 2013).

⁵ *Tragic Elephant Poaching Incident in Garamba* (Mar. 27, 2012), available at http://www.african-parks.org/News_24_Tragic+elephant+poaching+incident+in+Garamba.html; Simon Tomlinson, *Unimaginable Horror As Helicopter-Borne Poachers Massacre 22 Elephants Before Hacking Off Their Tusks and Genitals*, DAILYMAIL (Apr. 24, 2012), available at <http://www.dailymail.co.uk/news/article-2134696/Scene-unimaginable-horrorhelicopter-borne-poachers-massacre-22-elephants.html>. (Last visited January 17, 2013).

⁶ Bill Padgett, *African Elephant and CITES: The Next Step*, GLOBAL LEGAL STUDIES JOURNAL, (After CITES Appendix I was amended in 1989 to include African elephants, the price of ivory dropped from \$140 per pound in April 1989 to less than \$5 a pound in April 1990.), available at <http://www.repository.law.indiana.edu/cgi/viewcontent.cgi?article=1053&context=ijgls>. (Last visited January 17, 2013).

⁷ Testimony of Iain Douglas-Hamilton, Founder and CEO, Save the Elephants, United States of America Senate Foreign Relations Committee Hearing 5 (May 24, 2012), available at http://www.foreign.senate.gov/imo/media/doc/Iain_Douglas-Hamilton_Testimony.pdf. (Last visited January 17, 2013).

⁸ See Alex Shoumatoff, *Ivory and Agony*, VANITY FAIR (Aug. 2011), available at <http://www.vanityfair.com/culture/features/2011/08/elephants-201108>. (Last visited January 17, 2013).

⁹ International Fund for Animal Welfare, *Too Late – Military Intervention Fails to Halt Elephant Slaughter in Cameroon* (Mar. 12, 2012), available at <http://www.ifaw.org/united-states/news/too-late-%E2%80%93-military-intervention-fails-halt-elephant-slaughter-cameroon-graphic-image>; Raabia Hawa, *Five Rangers*,

estimated rate of approximately 100 a day, or 36,500 a year, for their ivory.¹⁰ The seriously escalating levels of illegal trade in elephant ivory are pushing these species toward extinction, not only for small and fragmented elephant populations, but also for previously secure large populations, and in excess of what can be sustained in all four African sub-regions such that elephant populations are now in net decline.¹¹ Local extinction of elephant populations already exists in parts of West and Central Africa.¹²

Therefore, in the interest of U.S. and international security and the preservation of African elephants, we urge the Administration to adopt the Committee's recommendations stated above. And recognizing the limited amount of time left to act and the urgency of the issue, we implore this Administration and the future Secretary of State to expedite its efforts to strengthen and expand international enforcement actions against poaching and trafficking in animals.

2. Approval of the Traveling Exotic Animal Protection Act

The Committee recommends the passage of the Traveling Exotic Animal Protection Act ("TEAPA") (H.R. 3359).¹³ This bill would amend the Animal Welfare Act (AWA), 7 U.S.C. §§ 2131 *et seq.*, to prohibit the use of wild and exotic animals in traveling circus acts if such animal traveled in a mobile housing facility within 15 days prior to the animal act.¹⁴ An exhibitor guilty of violating this prohibition would be subject to license suspension or revocation and fines.

This legislation is important because the overwhelming evidence indicates that traveling circuses are physically and psychologically harmful to animals. The tricks that circus animals are forced to perform require extreme physical coercion and abuse, such as hooks that tug at and puncture elephant skin, as well as whips, and chains.¹⁵ Traveling circuses are detrimental to

78 Elephants killed by poachers in a Year, The Star (Kenya), at <http://www.the-star.co.ke/news/article-18862/five-rangers-78-elephants-killed-poachers-year>. (Last visited January 17, 2013).

¹⁰ See Alex Shoumatoff, *Ivory and Agony*, VANITY FAIR (Aug. 2011), available at <http://www.vanityfair.com/culture/features/2011/08/elephants-201108>. (Last visited January 17, 2013).

¹¹ See Testimony of John Scanlon, Secretary-General of CITES, United States of America Senate Foreign Relations Committee Hearing 3 (May 24, 2012), available at http://www.foreign.senate.gov/imo/media/doc/Scanlon_Testimony.pdf. (Last visited January 17, 2013).

¹² Testimony of Iain Douglas-Hamilton, Founder and CEO, Save the Elephants, United States of America Senate Foreign Relations Committee Hearing 5 (May 24, 2012), available at http://www.foreign.senate.gov/imo/media/doc/Iain_Douglas-Hamilton_Testimony.pdf. (Last visited January 17, 2013).

¹³ The Committee's report concerning TEAPA is available at <http://www2.nycbar.org/pdf/report/uploads/20072237-HRBillTravelingExoticAnimalProtectionAct.pdf>. (Last visited January 17, 2013).

¹⁴ See proposed paragraph (i) to subdivision 13 of 7 U.S.C. § 2143; certain exceptions are provided in this proposed legislation for on-site, educational and research programs.

¹⁵ See, e.g., Deborah Nelson, *The Cruellest Show on Earth*, MOTHER JONES, 48-57 (Nov./Dec. 2011), available at <http://motherjones.com/environment/2011/10/ringling-bros-elephant-abuse>. (Last visited January 17, 2013).

animals' physical and psychological health and welfare due to the significant amount of time the animals spend confined in transit.¹⁶ The public safety and the safety of circus workers are also put at risk by the exhibition of wild and exotic animals in traveling exhibitions.¹⁷ And the transitory nature of traveling circuses makes application by law enforcement personnel of state anti-cruelty laws impractical, thereby requiring a Federal law to cover this area.¹⁸

There are approximately one dozen animal-free circuses in the United States, including the circus Cirque du Soleil which remains tremendously popular despite being animal-free. The passage of this bill will not hasten the end of circuses but hopefully change them for the better.

3. Downed Animal and Food Safety Protection Act

The Committee recommends the passage of the Downed Animal and Food Safety Protection Act (H.R. 3704).¹⁹ This bill would amend Public Law Sec. 85-765 (commonly known as the Humane Methods of Slaughter Act 1958), codified at 7 U.S.C. §§ 1901 *et seq.*, by adding provisions relating to the treatment of “nonambulatory livestock,” also known as “downed animals.” The bill, which applies to all livestock in interstate and foreign commerce, provides for the prompt humane euthanization of nonambulatory livestock. The bill also prohibits inspectors from passing through inspection any nonambulatory cattle and mandates USDA regulations to provide for the humane treatment, handling, and disposition of all nonambulatory cattle by entities covered by the law.

This bill is critical to help prevent adulteration of the food supply and to alleviate needless animal suffering. Downed cattle may pose a higher risk of contamination from E. coli, salmonella, or mad cow disease since they typically wallow in feces and their immune systems tend to be weak.²⁰ Recent investigations have continued to disclose repeated incidents of cruelty

¹⁶ See, e.g., Letter from Penny E. Cistaro, City of Sacramento Animal Care Services Manager, to Feld Entertainment regarding the findings of an inspection of Ringling (Sept. 9, 2010), available at [http://www.mediapeta.com/peta/PDF/20100909LetterFromCityofSacramentotoFeldEntmt\(00057028\).pdf](http://www.mediapeta.com/peta/PDF/20100909LetterFromCityofSacramentotoFeldEntmt(00057028).pdf); Deborah Nelson, *The Cruellest Show on Earth*, MOTHER JONES, 48-57 (Nov./Dec. 2011) available at <http://www.motherjones.com/environment/2011/10/ringling-bros-elephant-abuse>. (Last visited January 17, 2013).

¹⁷ See, e.g., Murray Evans, *Elephant That Escaped and Was Hit by SUV OK*, THE SEATTLE TIMES (Nov. 6, 2009), available at http://seattletimes.nwsource.com/html/nationworld/2010218625_apuscircuselephantescapes.html; See Zoocheck Canada, *The Bull in The China Shop: An Assessment of the Human Safety Risks Associated with Wild Performing Animals in Circuses* (June 2005), at <http://www.zoocheck.com/Reportpdfs/BullinCinashop.pdf>. (Last visited January 17, 2013).

¹⁸ See, e.g., Audit Report by the USDA Office of the Inspector General, Controls Over APHIS Licensing of Animal Exhibitors, 33601-10-Ch at 2 (June 2010), available at <http://www.usda.gov/oig/webdocs/33601-10-CH.pdf> (last visited Nov. 18, 2012).

¹⁹ The Committee's report concerning the Downed Animal and Food Protection Act is available at <http://www2.nycbar.org/pdf/report/uploads/20072295-CommentonDownedAnimals.pdf>. (Last visited January 17, 2013).

²⁰ E.g., *Beef Over Cattle Abuse Video Escalates; Animal Rights Groups, Cattle Industry Spar As 143 Million Pounds of Beef Is Recalled*, CBS News (Feb. 19, 2008), available at <http://www.cbsnews.com/stories/2008/02/19/national/main3846461.shtml>. (Last visited January 17, 2013).

against downed animals and/or attempts to make downed animals stand, including the abusive use of bulldozers and electroshock.²¹ Federal legislation is necessary to address the problem because the Supreme Court held in *National Meat Association v. Harris*²² that the Federal Meat Inspection Act preempts states from enacting laws relating to the euthanization of downed animals.

The bill would benefit from the following revisions: (1) provide that the method by which downed animals would be rendered unconscious when removed for testing should be strong enough to cause their loss of consciousness until euthanization, as provided by predecessor H.R. 4356; (2) include a more specific definition of and method for rendering animals unconscious for instances when downer animals must be moved; and (3) require that a downed animal be rendered unconscious by a licensed veterinarian through a barbiturate injection.

4. Preservation of Antibiotics for Medical Treatment Act

The Committee recommends passage of the Preservation of Antibiotics for Medical Treatment Act (“PAMTA”) (H.R. 965/S.2011).²³ This bill would amend section 201 of the Federal Food, Drug & Cosmetic Act²⁴ to phase out the non-therapeutic use of antimicrobial animal drugs used to treat humans in food producing animals. Federal legislation is necessary because states are preempted from enacting laws regulating antibiotic use in farmed animal feed.²⁵

A body of well-documented research and evidence shows that the overuse of non-therapeutic antibiotics in food producing animals is a threat to public health. The USDA acknowledges that there is a connection between the antimicrobial drug use in animals and Methicillin Resistant Staphylococcus Aureas (“staph”) infections in humans.²⁶ The Pew Commission on Industrial Farm Animal Production (PCIFAP) concluded that the present system of producing food animals in the United States is not sustainable largely due to the harm caused to the animals and the environment by the non-therapeutic use of antibiotics.²⁷ PCIFAP’s

²¹ See, e.g., Humane Society of the United States, *Abused Calves at Vermont Slaughter Plant* (Oct. 30, 2010), at http://www.humanesociety.org/news/news/2009/10/calf_investigation_103009.html. (Last visited January 17, 2013).

²² 132 S. Ct. 965 (2012).

²³ The Committee’s report concerning PAMTA is available at <http://www.nycbar.org/pdf/report/uploads/20071855-CommentrePreservationofAntibioticsforMedicalTreatmentAct.pdf>. (Last visited January 17, 2013).

²⁴ 21 U.S.C. § 321.

²⁵ *Animal Defense League Fund Boston, Inc. v. Provimi Veal Corp.*, 626 F. Supp. 278 (D. Mass. 1986), *aff’d no opinion*, 802 F. 2d 440 (1st Cir. 1986).

²⁶ SUSDA APHIS, *Methicillin-Resistant Staphylococcus Aureus: A Growing Concern for Animal and Human Health* 1 (Dec. 2007), at www.aphis.usda.gov/animal_health/emergingissues/downloads/mrsa_122007.pdf. (Last visited January 17, 2013).

²⁷ PCIFAP, *Putting Meat on the Table: Industrial Farm Animal Production in America* iii & 6 (Apr. 29, 2008), available at <http://www.ncifap.org/images/PCIFAPFin.pdf>. (Last visited January 17, 2013).

research studies concluded that the overuse of antibiotics in food animals led to antibiotic resistance in the consumers of these food animals and to the development of diseases resistant to the overused antibiotics.²⁸ The Food and Drug Administration, American Medical Association, Centers for Disease Control, World Health Organization and the Institute of Medicine of the National Academies of Science have all called for restrictions of antibiotic use for non-therapeutic purposes in food animals and PAMTA is supported by hundreds of organizations including the Union of Concerned Scientists, Consumers Union, and the Humane Society of the United States.

5. Approval of the Battlefield Excellence through Superior Training Practices Act

The Committee commends the administration for recently signing the National Defense Authorization Act into law insofar as it requires the Secretary of Defense to submit a plan for phasing out the use of animals in military training and recommends passage of the Battlefield Excellence through Superior Training Practices Act, known as the “BEST Practices Act” (H.R. 4269/S.3418).²⁹ The BEST Practices Act would add new section 2017 to Title 10 of the United States Code to require that the Secretary of Defense prescribe only the use of non-animal methods for training members of the Armed Forces for treatment of combat-related injuries and prohibit the use of animals for that purpose. The bill requires the development of human-based tests for treatment of combat-related illness and injury by 2014 and a moratorium on all non-human based tests in the treatment of combat trauma injuries by 2016.

The Department of Defense uses more than 6,000 live animals each year to train physicians, medics, corpsmen, and other personnel methods of responding to severe battlefield injuries.³⁰ In these training exercises, live animals are poisoned, shot, and set on fire, and have their legs amputated.³¹ Thus, the BEST Practices Act is critical to prevent the acute suffering inflicted upon the animal subjects during military medical training.

Training procedures using animals are unnecessary. The Congressional findings note that “the civilian sector has almost exclusively phased in the use of superior human-based training methods for numerous medical procedures currently taught in military courses using animals;” “medical simulation increases patient safety and decreases errors by healthcare providers;” “human-based medical training methods such as simulators replicate human anatomy and can allow for repetitive practice and data collection” and such simulators are already available to

²⁸ *Id.*

²⁹ The Committee’s report concerning the BEST Practices Act is available at <http://www.nycbar.org/pdf/report/uploads/20071979-CommentonBattlefieldExcellencethroughSuperiorTrainingPracticesAct.pdf>. (Last visited January 17, 2013).

³⁰ H.R. 1417 (112th Congress) § 2(2).

³¹ See, e.g., C.J. Chivers, *Tending a Fallen Marine With Skill, Prayer, and Fury*, NY TIMES (Nov. 2, 2006), available at http://www.nytimes.com/2006/11/02/world/middleeast/02medic.html?pagewanted=all&_r=0 (last visited January 17, 2013) (a Navy corpsman reported in this article that he kept a pig, who was the subject of a medical training exercise, alive for about 15 hours, during which time this animal was repeatedly shot, and finally died when he was set on fire).

teach most battlefield medical procedures and “will be available to teach all other procedures to respond to common battlefield injuries by 2014.”³²

The Committee recommends that the Senate bill be amended to omit an exception that allows for the use of animals in certain circumstances and that the House version of the bill be adopted due to the overwhelming evidence that live animal training is suboptimal.

6. Proposed Change to Fur Labeling Law Concerning Raccoon Dogs

The Committee requests the Administration’s support of a proposed amendment to the Fur Products Labeling Act regulations (Fur Rules), enforced by the Federal Trade Commission (FTC).³³ The FTC should (a) change the common name of *nyctereutes procyonoides* from “Asiatic raccoon” to “raccoon dog” in the section of the Fur Rules governing fur product labels and (b) reject fur industry proposals to allow use of terms such as “finnraccoon,” “tanuki” or “magnut” to describe that animal in the Name Guide.

Nyctereutes procyonoides is not a raccoon or closely related to raccoons but is a member of the canidae family. The canidae family includes domestic dogs, foxes and wolves. Misidentification of the fur of a canid as that of a raccoon violates the purpose and spirit of the Fur Products Labeling Act and the Truth in Fur Labeling Act of 2010. It also violates the requirement that the name of the product be “the true English name by which such animal can be properly identified in the United States and not the coined name of a fictitious animal.”³⁴ All major American dictionaries, American zoos, translations of Japanese newspapers, children's books, and state legislation refer to the animal as “raccoon dog” and other terms are almost never used outside of the fur industry. Using any other name to label such fur would be confusing to consumers, some of whom may object to wearing fur from a relative of the domestic dog.

³² S 3418, § 2. On June 3, 2009, Charles J. Rosciam, M. H. A., a retired Captain with the United States Navy’s Medical Service Corps. and 16 other former military physicians, medics and nurses, joined the Physicians Committee for Responsible Medicine in filing a petition for enforcement with the Army Surgeon General to end the use of animals in the military’s trauma and chemical casualty care training. The petition specified the existence of superior non-animal, human-based training methods.

³³ The Committee’s comment concerning changes to the Fur Rules are *available at* <http://www2.nycbar.org/pdf/report/uploads/20072356-FurRulesReview.pdf>. (Last visited January 17, 2013).

³⁴ 15 U.S.C. § 69e(a).

C. CONCLUSION

The Association appreciates your consideration of our Committee's comments. We believe that our recommendations, if adopted, would advance public health, animal welfare, and consumer and environmental protection.

Yours truly,



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