

MEMORANDUM

TO: Section and Division Chairs

FROM: Carolyn B. Lamm, Chair
Board of Governors Operations and Communications Committee

SUBJECT: Commenting Entity Form for Blanket Authority Procedure

DATE: April 26, 2005

Attached is a form to be completed by ABA Sections and Divisions requesting authority to submit technical comments under the Blanket Authority Procedure.

As a reminder, in order to submit technical comments, your entity must demonstrate an expertise in the subject area of the comments. As you may recall, at its February 2005 meeting, the Board of Governors, upon recommendation of the Operations and Communications Committee, deferred the requests of ABA Sections for authority to submit technical comments and to serve as reviewing entities for technical comments under the Blanket Authority Procedure. This action was taken to permit the Operations and Communications Committee to develop forms, to be completed by entities requesting commenting and reviewing authority, which will provide additional information regarding the requests and ensure greater clarity in the application process.

If your entity is interested in submitting technical comments, please complete the attached form and return it to Marilyn R. Barmash (mbarmash@staff.abanet.org, 312-988-5160), by Monday, May 16, 2005. Please provide as much specific detail as possible, using additional pages if necessary. The completed commenting entity forms will then be circulated to all Sections along with a form to request reviewing authority for these technical comments. The Board will consider all commenting and reviewing entity requests.

If you have any questions, please feel free to contact Ms. Barmash.

cc: Stephen N. Zack Alpha M. Brady
Ellen F. Rosenblum Marilyn R. Barmash
Robert D. Evans Section and Division Staff Directors
Marina B. Jacks
Attachment

**Request for Technical Commenting Authority
Under Blanket Authority Procedure Adopted by the
ABA House of Delegates in August 2004**

ABA Entity Requesting Commenting Authority _____

Date of Request _____

Governmental Agency or Agencies for which Commenting Authority is Requested
(Please List Here):

Please answer each of the following questions, providing as much specific detail as possible:

1. Describe specific issues involving the entity's expertise that have or are expected to arise at the governmental agency or agencies listed above.

2. List the issues with as much specificity as possible on which your entity wishes to provide technical comments.

3. Describe the entity's expertise with respect to the technical commenting authority requested. (The response should include information on the entity's authorized jurisdiction.)

4. Describe the past issues for which the entity has requested authority to comment with respect to the governmental agency or agencies listed above and the dates of such requests, and indicate whether or not authority to comment was approved through the House of Delegates or Blanket Authority procedures.

5. Describe the review process established by the entity to ensure the quality of the technical comments before the comments are submitted.