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12/06/2002 02:25:39 PM

Record Type: Record

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Subject: comments

To make the process fair and equitable, and to allow for less GAO challenges utilizing the previous circular, will we be allowed to utilize the grandfather principal for those full studies already at announcement and started? To start over on a full study would essentially go against saving the taxpayers money. I can understand not using the grandfather principal for other study processes, (i.e., express review, streamlined, etc.) under the revised circular, but to start from scratch in the middle of gathering activities performances in all areas being studied using the full study process is not cost effective. I think interested parties could challenge the decision not to grandfather, if the full studies were started under the previous circular requirements and agencies are made to start over under the new revision. These challenges could create a snowball effect throughout all agencies where interested parties could appeal the same.

v/r