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To: Lorraine D. Hunt OIRA ECON GUIDE/OMB/EOP@EOP

CC:

Subject: OMB Draft Guidelines

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March 26, 2003

Office of Information and Regulatory Affairs Lorraine Hunt Office of Management and Budget, NEOB Room 10202, 725 17th Street, NW Washington, DC 20503

Dear Office of Information and Regulatory Affairs Hunt:

The "OMB Draft Guidelines for the Conduct of Regulatory Analysis and the Format of Accounting Statements" determines that saving the life of an elderly person is worth less than saving the life of a younger person, and I find this kind of number-working to be very disturbing. These "Guidelines" appear to me as dangerous pretext for cutting the value of health and safety standards in order to protect, not the well-being of the people, but of politically favored industries. The analysis proposes to devalue the life of a human over 70 to 2/3 that of the rest of the population and lowers the established EPA price tag of a human life from \$6.1 million to \$3.7 million. This conclusion, that the lives of senior citizens are less valuable than others, raises serious ethical and Further, if said analysis is fully applied, scientific questions. regulations for air pollution, toxic waste cleanup, food labeling and other quality of life issues could be weakened or not even implemented at all. And, finally, and ironically, it will be the senior citizens themselves who will feel the brunt of these changes since their health is the most vulnerable to dirty air and unhealthy food. (Will their lives be even less valuable then?)

Sincerely,

Analiese Miller