

November 25, 2015

Mr. Howard Shelanski, Administrator  
Office of Information and Regulatory Affairs  
The Office of Management and Budget  
725 17th Street, NW  
Washington, DC 20503

Mr. Tony Scott, Federal Chief Information Officer  
Eisenhower Executive Office Building  
1650 Pennsylvania Ave. NW  
Washington, DC 20503

Dear Mr. Shelanski and Mr. Scott,

OpenTheGovernment.org, the American Association of Law Libraries, Association of Research Libraries and Government Accountability Project write to submit our comments on the proposed revision of Circular A-130, which have also been submitted on GitHub. These comments are endorsed by the American Library Association, Bauman Foundation, Bill of Rights Defense Committee, Center for Media and Democracy, Defending Dissent Foundation, Project On Government Oversight, and Transactional Records Access Clearinghouse (TRAC). The undersigned organizations also write to express concern that the Notice in the official Federal Register consists merely of cursory Supplemental Information and requires anyone wanting substantive information – including the deadline for submission – to follow a link. Until there is easy-to-use software available for use by all of the public, OMB should continue to ensure meaningful public participation by notifying the public of opportunities to comment and accepting comments in other formats.

Circular A-130 has a significant impact on public access to government information, as well as the management of federal government records and other resources that are vital to the public interest. While we understand and appreciate the efficiencies that digital government provides, it should not be used in a manner that requires significant extra steps by members of the public to participate in government. We think it inappropriate for government to erect new barriers to public participation in government decision-making by presenting opportunities for public participation in a solely digital format that is difficult to use.

Thank you for consideration of our comments (attached separately). If you have any questions, please contact Patrice McDermott, Executive Director of OpenTheGovernment.org, at [pmcdermott@openthegovernment.org](mailto:pmcdermott@openthegovernment.org), 202.332.6736.

Sincerely,

American Association of Law Libraries  
American Library Association  
Association of Research Libraries  
Bauman Foundation  
Bill of Rights Defense Committee  
Center for Media and Democracy  
Defending Dissent Foundation

Electronic Privacy Information Center (EPIC)\*  
Government Accountability Project  
National Security Archive\*  
OpenTheGovernment.org  
Project On Government Oversight  
Transactional Records Access Clearinghouse  
(TRAC)

*\*Signatures do not constitute an endorsement of the attached comments.*

Attachment: Comments of OpenTheGovernment.org, the American Association of Law Libraries, Association of Research Libraries and Government Accountability Project on the 2015 Proposed Revision of Circular A-130

Endorsed by: American Library Association, Bauman Foundation, Bill of Rights Defense Committee, Center for Media and Democracy, Defending Dissent Foundation, Government Accountability Project, Project On Government Oversight, and Transactional Records Access Clearinghouse (TRAC)