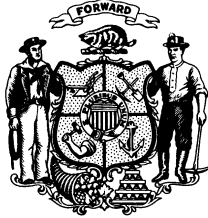


WISCONSIN LEGISLATIVE COUNCIL STAFF

RULES CLEARINGHOUSE

Ronald Sklansky
Director
(608) 266-1946

Richard Sweet
Assistant Director
(608) 266-2982



David J. Stute, Director
Legislative Council Staff
(608) 266-1304

One E. Main St., Ste. 401
P.O. Box 2536
Madison, WI 53701-2536
FAX: (608) 266-3830

CLEARINGHOUSE RULE 98-044

Comments

[NOTE: All citations to “Manual” in the comments below are to the Administrative Rules Procedures Manual, prepared by the Revisor of Statutes Bureau and the Legislative Council Staff, dated October 1994.]

2. Form, Style and Placement in Administrative Code

- a. In s. NR 8.01, “In this chapter:” should precede sub. (1).
- b. Section NR 8.02 (4) seems like it could be incorporated into s. NR 8.02 (2) (a) since the licenses in that paragraph are also issued by the department and county clerks. Are the licenses in s. NR 8.02 (4) placed in a separate subsection for a specific reason, such as being nonrecreational licenses?
- c. In s. NR 8.03 (2), “license sales agent” is used. In other provisions of the rule, the defined term “license agent” is used. Is there a reason for using different terms?
- d. Section NR 8.03 (2) (b) implies that the county clerk, not the Department of Natural Resources, approves the agents. Is this the correct procedure?
- e. Section NR 8.04 (intro.) should be written in the active voice: “A license agent shall do all of the following:”.
- f. In s. NR 8.05 (2) (b), the introductory paragraph should say: “Persons purchasing privileges conferred under par. (a) may obtain a stamp at no additional charge from the department by doing one of the following:”. Then, the items should be listed in proper list format, by putting a period at the end of each item and deleting “; or”.

5. Clarity, Grammar, Punctuation and Use of Plain Language

- a. Section NR 8.03 (2) (d) mentions “vacancies.” This implies that a set number of approvals are issued by the department. If this is true, it should be clarified.

b. In s. NR 8.04 (2), the word “a” or “the” should be inserted between the words “Issue” and “license.”

c. Section NR 8.06 requires the purchaser who wants to purchase an approval on behalf of another person to “meet all the requirements in s. NR 8.05.” It is unclear as to which s. NR 8.05 requirements apply to a purchaser versus an applicant. Some of these requirements do not seem like they would be applicable to a purchaser who is not an applicant. This should be clarified.