

# WISCONSIN LEGISLATIVE COUNCIL STAFF

## ***RULES CLEARINGHOUSE***

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## **CLEARINGHOUSE RULE 00-137**

### **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 September 1998.]**

#### **2. Form, Style and Placement in Administrative Code**

- a. In s. Trans 4.09 (4) (b), each subdivision should be renumbered from 1. to 6. In other words, the notation “(1)” should be replaced by the notation “1.”
- b. “Pars.” should be substituted for “subs.” in s. Trans 4.09 (4) (e), (f) and (g) and “par.” should be substituted for “sub.” in s. Trans 4.09 (4) (d).
- c. In s. Trans 4.09 (4) (f) 1., the phrase “shall be responsible for paying” should be replaced by the phrase “shall pay.”

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

- a. Section Trans 4.09 (4) (c) is not clear concerning how cost efficiency measurements for transit systems will be determined. First, read literally, transit systems that *exceed* mean cost efficiency standards by more than one standard deviation would be judged not in compliance under the fifth sentence of s. Trans 4.09 (4) (c). Second, s. Trans 4.09 (4) (c) is not clear concerning what transit systems will be used to establish performance standards. For Milwaukee, Madison and medium bus systems, will data for all mass transit systems contained in the national transit data base be used, including data for small and commuter bus systems and shared ride systems? For the small and commuter bus and shared ride taxi systems, will data from only comparable in-state systems be used to establish performance standards or will data

from Milwaukee, Madison and medium bus systems also be used? Section Trans 4.09 (4) (c) should be redrafted to address these ambiguities.

b. In s. Trans 4.09 (4) (g), the word “they” in the second sentence, should be replaced by the word “it.”