WISCONSIN LEGISLATIVE COUNCIL
RULES CLEARINGHOUSE

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CLEARINGHOUSE RULE 19-035

Comments

[NOTE: All citations to "Manual" in the comments below are to the Administrative Rules Procedures Manual, prepared by the Legislative Reference Bureau and the Legislative Council Staff, dated December 2014.]

4.   Adequacy of References to Related Statutes, Rules and Forms

The entire chapter being amended, ETH 1, should be checked to ensure consistency of terms used in the rules with the terms used in current ch. 11, Stats. For example, ch. ETH 1 refers to "political party committee" and "candidate's personal campaign committee", while ch. 11, Stats., uses the defined terms "political party" and "candidate committee".

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

a.   In SECTION 7 of the proposed rule, s. ETH 1.96 (2) provides that "all attributions required by s. 11.1303, Stats., shall be readable, legible, and readily accessible". The rule should specify that only attributions in *written* communications must be readable, legible and readily accessible, consistent with s. 11.1303 (2) (g), Stats., because the requirement is not applicable to certain communications such as radio ads.

b.   In SECTION 7 of the proposed rule, s. ETH 1.96 (3) (intro.) is missing the word "of," and should read "Communications that are contained in or on any of the following…".

c.   In SECTION 7 of the proposed rule, s. ETH 1.96 (3) (e) exempts from attribution requirements online ads and similar electronic communications where the required language cannot conveniently be "printed", but which link to a website containing the required attribution language. Is the term "printed" appropriate for referring to language on online and electronic communications? Would it be more accurate to use "appear", "contain", or another verb?