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RULES CLEARINGHOUSE

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CLEARINGHOUSE RULE 99-104

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. ERC 33.01, the first word of the stricken material should not be capitalized. In addition, a comma should be inserted before the stricken material and stricken to be consistent with the current rule. Finally, the period at the end of the stricken material should not be stricken because the remaining portion of the section needs end punctuation.

b. In s. ERC 33.13 (2) (b), the “(b)” should not be capitalized. Also, since the entire current paragraph is stricken and new material is added, the paragraph should be repealed and recreated, rather than amended.

c. Because s. ERC 13.13 (2) (d) is being created, it should not be underscored.

d. SECTION 6 of the rule purports to repeal and recreate “Appendix A” of the current rule. However, the Appendix to the current rule contains Forms A, B and C. It appears that the intent of SECTION 6 is only to repeal and recreate Form C of the Appendix. The treatment clause of SECTION 6 should be modified accordingly.

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

The statutory reference in the effective date provision of the rule should be to s. 227.22 (2) (intro.), Stats.

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

- a. In ss. ERC 33.03 and 33.12 (2) (b), “odd numbered” should be hyphenated.
- b. In Form C, which is amended by SECTION 6 of the rule, the material in each lettered paragraph should end with a colon rather than a period.