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## WISCONSIN LEGISLATIVE COUNCIL RULES CLEARINGHOUSE

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### CLEARINGHOUSE RULE 04-111

#### 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 2002.]**

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

a. The April 13, 2004, memo from the Director of the Legislative Council Rules Clearinghouse regarding new rule-making requirements imposed by 2003 Wisconsin Acts 118 and 145 suggests, on page 2, a format for an analysis that prefaces a rule. The format lists 13 statutorily required items. The preface of this rule should be compared to the list of items to determine which items have yet to be completed.

b. In the preface description of the rule’s effect on small business, the word “is” should be replaced by the word “are.”

c. In s. NR 20.20 (53) (f), some of the subunits end with periods, while other subsections do not. One format should be used consistently throughout the rule.

d. In s. NR 20.20 (63) (c) 1., the word “None” is used in the “Minimum Length or Other Size Restrictions (Inches)” column, but in par. (c) 2., the notation “-” is used in this column, which presumably indicates there are no length or size restrictions. One format should be used consistently throughout the rule.

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

The analysis in this rule states that on Melancthon Creek, bait may be used downstream from STH 80, but only artificial lures may be used upstream from STH 80. However, s. NR 20.20 (53) (f) 2. and 3. provide the opposite information. The department should clarify whether the analysis or the rule provisions are correct.