



WISCONSIN LEGISLATIVE COUNCIL RULES CLEARINGHOUSE

Ronald Sklansky
Clearinghouse Director

Richard Sweet
Clearinghouse Assistant Director

Terry C. Anderson
Legislative Council Director

Laura D. Rose
Legislative Council Deputy Director

CLEARINGHOUSE RULE 07-106

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 January 2005.]

2. Form, Style and Placement in Administrative Code

- a. The department’s summary of the rule explains in general fashion what the rule does but does not summarize the rule’s content. At a minimum, the rule should identify how it differs from the provisions of current ch. Tax 53, including fee increases.
- b. It is assumed that ch. Tax 53 will eventually be repealed.
- c. A title should be provided for the newly created chapter.

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

In s. Adm 49.06 (3), “s.” should precede the cited rule, and “49.03” should replace “43.03”.

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

- a. It is assumed that the deletion of “drawing” from the definition of “sheet” was intentional. Compare current s. Tax 53.02 (4).
- b. A parenthesis should follow “submission” in s. Adm 49.03 (1) (b).
- c. Section Adm 49.06 (3) does not contain any standard, other than “unusual circumstances”, that the department may invoke when waiving fees. Can more specificity be provided?