



WISCONSIN LEGISLATIVE COUNCIL RULES CLEARINGHOUSE

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CLEARINGHOUSE RULE 10-080

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 September 2008.]

1. Statutory Authority

a. Section 560.255, Stats., specifies a grant of \$60,000 to the Wisconsin angel network, not a grant of “up to” \$60,000. The section also instructs the department that it shall enter into a contract with the angel network. It does not refer to contracts with authorized representatives. What is the department’s basis for authority to include language referencing authorized representatives in s. Comm 126.03 (2)?

b. In s. Comm 126.04 (1), the department repeats statutory text found in s. 560.277 (2), Stats., with slight modifications, such as inclusion of “for-profit” and “Wisconsin,” and substitution of “or” for “and.” The department should further explain the basis for these changes, or revise the proposed rule to more closely match the statute.

2. Form, Style and Placement in Administrative Code

a. Throughout the proposed rule, the department should not capitalize “angel network” or “venture fund.” Also, in s. Comm 126.07 (title), “Council” should be lower case.

b. In s. Comm 126.02 (2), does the department intend to define “early stage entity” as the term is used in other economic development programs? Similarly, the department also may wish to define “new business idea.”

c. In s. Comm 126.03 (2), the use of the phrase “the deliverables” is vague and should be clarified.

d. Section Comm 126.07 (2) (e) is confusing. Is the department proposing that the advisory council would be required to make recommendations to the department on annual reporting to the advisory council? What types of annual reporting to the advisory council does the department anticipate?

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

The department should conform with s. 227.14 (3), Stats., with regard to forms referenced in s. Comm 126.06.