



WISCONSIN LEGISLATIVE COUNCIL RULES CLEARINGHOUSE

Scott Grosz
Clearinghouse Director

Terry C. Anderson
Legislative Council Director

Margit Kelley
Clearinghouse Assistant Director

Jessica Karls-Ruplinger
Legislative Council Deputy Director

CLEARINGHOUSE RULE 16-087

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.]

1. Statutory Authority

The department should consider adding plain language to describe its statutory authority to promulgate the proposed rule to the statutory language listed in the “statutory authority” section of the rule summary.

2. Form, Style and Placement in Administrative Code

a. New underscored material must immediately follow, rather than precede, the stricken material in SECTIONS 1 to 4 of the rule. [s. 1.06 (1) (a), Manual.]

b. The department should consider amending the proposed rule’s relating clause to clarify that the proposed order affects fire protection requirements for the facilities listed. [s. 1.02 (1) (a), Manual.]

3. Conflict With or Duplication of Existing Rules

Sections DHS 132.82 (1) (Note) and DHS 134.82 (1) (Note) refer to the 2000 edition of the Life Safety Code (LSC), but the Notes are not amended by the proposed rule. The Notes should be amended to reference the 2012 edition of the LSC and include the appropriate location where a copy of the 2012 edition of the LSC may be obtained.

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

a. The “Comparison with rules in adjacent states” section of the rule summary identifies that states must comply with the 2012 edition of the LSC, but there is no information regarding whether any adjacent states have taken action to comply with the 2012 edition of the LSC.

b. The “Related statute or rule” section of the rule summary should be titled “Related statutes or rules”.