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# Wisconsin Legislative Council

## RULES CLEARINGHOUSE

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### CLEARINGHOUSE RULE 22-047

#### Comments

**[NOTE: All citations to “Manual” in the comments below are to the Administrative Rules Procedures Manual, prepared by the Legislative Council Staff and the Legislative Reference Bureau, dated November 2020.]**

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

a. In its analysis, it may be helpful for the department to briefly describe its compliance with s. 480.06 (1), Stats., which directs the submission of proposed rules to the auctioneer board prior to submission of those rules to the Rules Clearinghouse.

b. The proposed rule relates to reciprocity for service members, former service members, and their spouses. How does the department intend for the proposed rule to interact with s. 480.12, Stats., which relates to general reciprocity? For example, at present, how are requests for reciprocity under the general statute administered?

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

In SECTION 1 of the proposed rule, the department refers to issuance of “a reciprocal certificate or a license to practice as an auctioneer”. However, ch. 480, Stats., and ch. SPS 121, Wis. Adm. Code, appear to refer to registration of an auctioneer and issuance of a registration certificate, but do not refer to license or issuance of a license. Would it be appropriate to remove the reference to issuance of a “license to practice” from the proposed rule?