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To: Lorraine D. Hunt OIRA ECON GUIDE/OMB/EOP@EOP
cc:
Subject: Stop OMB Draft Guidelines for the Conduct of Regulatory Analysis

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March 27, 2003

Office of Information and Regulatory Affairs Lorraine Hunt
Office of Management and Budget, NEOB
Room 10202, 725 17th Street, NW
Washington, DC 20503

Dear Office of Information and Regulatory Affairs Hunt:

Please do not continue with the OMB Draft Guidelines for the Conduct of Regulatory Analysis. I believe this Draft is incorrect in its assessment of the valuation of human life for the following reasons.

- The "OMB Draft Guidelines for the Conduct of Regulatory Analysis and the Format of Accounting Statements" determines that saving the life of an elderly person is worth less than saving the life of a younger person..
- This is a mere pretext to cut the value of health and safety standards in order to protect the industries that stand to gain from this White House initiative.
- As an American citizen who is the grandchild of a senior citizen, I find that devaluing an elderly person's life is unethical and unmoral.
- The OMB's conclusion that the lives of senior citizens are less valuable raises serious ethical and scientific questions.
- The analysis proposes to devalue the life of a human over 70 to 2/3 that of the rest of the population and lowers the established EPA price tag of a human life from \$6.1 million to \$3.7 million.
- If analysis is fully applied, regulations for air pollution, toxic waste cleanup, food labeling and other quality of life issues could be weakened or not even implemented at all—and our senior citizens will feel the brunt of it since their health is the most vulnerable to dirty air and unhealthy food.

Sincerely,

Edward Paul