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03/28/2003 02:56:12 PM

Record Type:Record

To: Lorraine D. Hunt OIRA ECON GUIDE/OMB/EOP@EOP

cc:

Subject: OMB Draft Guidelines

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March 28, 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:

The "OMB Draft Guidelines for the Conduct of Regulatory Analysis and the Format of Accounting Statements" values the life of an elderly person as worth less than the life of a younger person. The analysis proposes to devalue the life of a human over 70 to 2/3 that of the rest of the population. The OMB's conclusion that the lives of senior citizens are less valuable raises serious ethical and scientific questions.

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. 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.

I urge you to oppose these draft guidelines.

Sincerely,

Lynda James