

Joan Keener <joankeener@earthlink.net>
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To: Lorraine D. Hunt OIRA ECON GUIDE/OMB/EOP@EOP

cc:

Subject: OMB Draft Guidelines for Conduct of Regulatory Analysis

Joan Keener
4761 Broadway
New York City, NY 10034

April 2, 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" determines that saving the life of an elderly person is worth less than saving the life of a younger person..

As an American citizen who is the child of a senior citizen and the close friend of other senior citizens, I find that devaluing an elderly person's life is deeply immoral as well as simply short-sighted and wrong-headed.

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.

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.

The OMB's conclusion that the lives of senior citizens are less valuable than the rest of our lives raises serious ethical and scientific questions.

If this analysis is fully applied, regulations for air pollution, toxic-waste cleanup, food labeling and other quality of life issues will likely be weakened or never even implemented and our senior citizens will bear the brunt of it since their health is the most vulnerable to dirty air and unhealthy food.

I am appalled by the recommendations of the OMB and I will not stand to see our health endangered and the inherent value of our senior citizens belittled by a faulty analysis.

Sincerely,

Joan Keener