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**Professional Experience**

*Founder, Regulatory Studies Center, and Distinguished Professor of Practice, Trachtenberg School of Public Policy & Public Administration, The George Washington University.* (September 2009 to present; *Director* until January 2024) Established the GW Regulatory Studies Center to improve regulatory policy through research, education, and outreach. The Center is a leading source for applied scholarship on regulatory issues, and a training ground for current and future policy officials who want to understand the effects of regulation and ensure that regulatory policies are designed to make the public better off.

*Administrator, Office of Information & Regulatory Affairs, Office of Management and Budget.* (April 2007-January 2009) (*Counselor*, January 2007-April 2007) Nominated by the President on July 31, 2006 and appointed on April 4, 2007 to head the office that reviews draft executive branch regulations under Executive Order 12866, and collections of information under the Paperwork Reduction Act. The Office develops and oversees the implementation of government-wide policies in the areas of information technology, information policy, privacy, and statistical policy. OIRA also oversees agency implementation of the Information Quality Law, including the peer review practices of agencies. Served as lead US official on international regulatory issues, including Co-Chair of the EU-US High Level Regulatory Cooperation Forum.

*Director, Regulatory Studies Program, Mercatus Center at George Mason University.* (October 2003 to January 2007) (*Senior Research Fellow & Deputy Director*, October 1998 to October 2003) Directed the research and outreach efforts of this non-profit research and educational program, which analyzes federal regulatory actions from the perspective of the public interest and serves as a bridge between academics and policymakers on regulatory issues. Authored comments, papers, and articles, and presented research results to the media, Congressional staff and other interested parties.

*Adjunct Professor of Law, George Mason University School of Law.* Developed and taught courses and clinics on regulation. (Fall 2002 to Spring 2006)

*Adjunct Professor*, Georgetown University. Taught Bryce Harlow Institute on Business and Government Affairs course, “Business, Government, and Public Policy.” (Summer 2003, 2004)

*Instructor*, ExNet Utility Management Programs, and individual electric utility companies. (1996 to 2002) Developed and taught 1- and 2-day courses to utility executives on managing energy risks with derivatives instruments.

*Vice President and Director of Environmental Analysis*, Economists Incorporated. (1991 to 1998) Provided economic and policy analysis for private and public clients on environmental and energy issues.

*Economist Advisor to Commissioner Albrecht*, Commodity Futures Trading Commission. (1989 to 1991) Advised Commissioner on regulatory and financial issues related to derivative instruments and trading.

*Deputy Chief*, Natural Resources Branch, Office of Information and Regulatory Affairs, Office of Management and Budget. (1985 to 1989) As *Deputy Chief* (from July 1987), supervised staff responsible for oversight of regulatory policy at Environmental Protection Agency and Department of Energy; developed and negotiated Administration’s regulatory and legislative positions. As *Senior Economist*, reviewed environmental regulations, and their supporting impact analyses, to ensure they provided net benefits to society.

*Financial Consultant*, Environmental Protection Agency. (1984 to 1985) Formulated economic incentives to make the enforcement of environmental regulations more effective. Developed the financial model for calculating non-compliance penalties that has been incorporated in EPA’s enforcement policy. Served as expert for the Department of Justice in civil penalty negotiation.

*Associate*, Putnam, Hayes and Bartlett, Inc. (1981 to 1984) Provided financial and economic analysis to the U.S. Government for environmental and energy policy decisions. Analyzed the impact on private sector clients of legislation, regulation, and competitor behavior.

*Financial Analyst*, General Electric Company. (Summer 1980)

*Research Associate*, Temple, Barker & Sloane, Inc. (1978 to 1979)

*Research Assistant*, Charles River Associates. (1977 to 1978)

## **Education**

S.M. Sloan School of Management, Massachusetts Institute of Technology, 1981. Concentrations in applied economics and finance.

B.S. (*summa cum laude*) Resource Economics, University of Massachusetts, 1977.

## Professional Activities

*Chairman*, Regulatory Transparency Project Regulatory Process Working Group, Federalist Society (2016 to 2024) *Member* (2024 to present)

*Regulatory Advisory Board*, Norm Ai (2023 to present)

*Committee Member*, The National Academies of Sciences, Engineering, and Medicine, Committee on the Review of Methods for Setting Building and Equipment Performance Standards. (2020 to 2021)

*Senior Fellow*, Administrative Conference of the United States (2016 to present; *Public Member*, 2010 to 2016)

*Board Member*, Economists Incorporated (2015 to 2021)

*Board Member*, National Federation of Independent Businesses Legal Foundation (May 2009 to 2018; Spring 2005 to January 2007).

*Executive Committee Member*, Federalist Society Administrative Law and Regulation Practice Group (2009 to 2021)

*Fellow*, National Academy of Public Administration (2014 to 2022)

*President*, Society for Benefit Cost Analysis (Three-year term: Past President 2017, President 2016, Vice-President 2015; Board member, 2012 to 2017)

*Executive Committee Member*, Association of Private Enterprise Education (Spring 2005 to January 2007, April 2010 to April 2012).

*Member*, U.S. Chamber of Commerce, Regulatory Affairs Committee (2003 to 2006)

*Member and Working Group Chair*, Virginia Environmental Education Advisory Committee. Appointed by Governor Jim Gilmore. (2000 to 2002) Chaired the working group responsible for making recommendations to the Governor regarding resource allocation for environmental education in the Commonwealth.

*Member*, Virginia Administrative Law Advisory Committee. Appointed by the Virginia Code Commission. (2000 to 2003) The committee advised the Commission and the Virginia General Assembly on matters related to administrative law.

*Member*, Virginia Waste Management Board. Appointed by Governor George Allen. (1996 to 2001) The Board is responsible for promulgating and enforcing waste management regulations for the Commonwealth of Virginia.

## Publications (Journals & Books)

“Better Regulation in the United States,” in [Handbook of Regulatory Authorities](#) with Jerry Ellig. Edward Elgar publishing (2022).

“[Regulatory Compliance Burdens: Literature Review and Synthesis](#)” with Joseph Cordes and Layvon Washington. With support from the Pew Charitable Trusts (2022).

“[Milestones in the Evolution of the Administrative State](#),” *Daedalus* 150 (3) (Summer 2021). American Academy of Arts and Sciences, MIT Press (2021).

*Jerry Ellig on Dynamic Competition and Rational Regulation*, editor with Patrick McLaughlin. Mercatus Center at George Mason University (2021)

National Academies of Sciences, Engineering, and Medicine. 2021. *Review of Methods Used by the U.S. Department of Energy in Setting Appliance and Equipment Standards*. Washington, DC: The National Academies Press. <https://doi.org/10.17226/25992>. (Consensus Report) with Cohen et al.

“[The Office of Information and Regulatory Affairs and the durability of regulatory oversight in the United States](#),” *Regulation and Governance*. <https://doi.org/10.1111/rego.12337> (2020)

“[Nudging the nudger: Toward a choice architecture for regulators](#),” *Regulation and Governance*, with Zhoudan Xie. <https://doi.org/10.1111/rego.12329> (2020)

“[Regulatory Oversight and Benefit-Cost Analysis: A Historical Perspective](#),” *Journal of Benefit-Cost Analysis*. Vol. 11, Issue 1 (2020)

“[Designing a Choice Architecture for Regulators](#),” *Public Administration Review*, with Zhoudan Xie. Vol. 80, Issue 1 (2020).

“[Dynamic Benefit-Cost Analysis for Uncertain Futures](#),” *Journal of Benefit-Cost Analysis*, with Daniel R. Pérez, Brian F. Mannix, and Christopher Carrigan (2019).

“[Improving Regulatory Benefit-Cost Analysis](#),” *The Journal of Law & Politics*, Vol. XXXIV, No.1, with Brian Mannix (2018).

[FY 2019 Regulators’ Budget: More for Homeland Security, Less for Environmental Regulation](#), a joint report of the GW Regulatory Studies Center and the Weidenbaum Center at Washington University in St. Louis. With Melinda Warren, May 14, 2018.

“[Book Review of Andrew W. Lo’s ‘Review of Adaptive Markets: Financial Evolution at the Speed of Thought.’](#)” *Journal of Risk Analysis*, Vol. 38, Issue 2 (February 2018).

[Transatlantic Approaches to Agriculture Policy: Transatlantic Agriculture & Regulation Working Paper Series: No. 3](#), with Lydia Holmes, Daniel R. Pérez, Aryamala Prasad, &

Zhoudan Xie. GW Regulatory Studies Center (supported by the U.S. Department of Agriculture). October 04, 2017.

[Agricultural Statistics: Transatlantic Agriculture & Regulation Working Paper Series: No. 1](#), with L. Holmes, P. Linquiti, B. Mannix, D. Pérez, A. Prasad & Z. Xie. GW Regulatory Studies Center (supported by the U.S. Department of Agriculture). September 20, 2017.

[“Consumer’s Guide to Regulatory Impact Analysis: Ten Tips for Being an Informed Policymaker,”](#) *Journal of Benefit-Cost Analysis*. with Richard Belzer, Glenn Blomquist, Timothy Brennan, Christopher Carrigan, Joseph Cordes, Louis A. Cox, Arthur Fraas, John Graham, George Gray, James Hammitt, Kerry Krutilla, Peter Linquiti, Randall Lutter, Brian Mannix, Stuart Shapiro, Anne Smith, W. Kip Viscusi & Richard Zerbe. July 27, 2017

[“Improving Regulatory Science: A Case Study of the National Ambient Air Quality Standards,”](#) with Marcus Peacock. *Supreme Court Economic Review* 2017 24:1, 49-99

[“Putting a Cap on Regulation,”](#) *Administrative & Regulatory Law News*, the American Bar Association. Vol. 42, No. 3. (Spring 2017)

[“Retrospective Evaluation of Chemical Regulations,”](#) *OECD Environment Working Papers, No. 118* (2017).

[Regulators’ Budget Reflects President Trump’s Priorities](#), a joint report of the GW Regulatory Studies Center and the Weidenbaum Center at Washington University in St. Louis. With Melinda Warren, July 18, 2017.

[“Can Fiscal Budget Concepts Improve Regulation?”](#) *NYU J. Legislation & Public Policy*. Vol. 19:259 (2016).

[Regulators’ Budget from Eisenhower to Obama](#), a joint report of the GW Regulatory Studies Center and the Weidenbaum Center at Washington University in St. Louis. With Melinda Warren, May 17, 2016.

[“Regulatory Accretion: Causes and Possible Remedies,”](#) *Administrative Law Review Accord*. March 3, 2016. With Sofie E. Miller

[“Regulatory Science and Policy: A Case Study of the National Ambient Air Quality Standards,”](#) GW Regulatory Studies Center Working Paper. September 9, 2015.

[“Reforming Regulation,”](#) *Reviving Economic Growth*, edited by Brink Lindsey, 2015.

[“The Role of Transparency in Regulatory Governance: Comparing US and EU Regulatory Systems,”](#) *Journal of Risk Research* (2015). With Kai Wegrich.

[“The Limits of Irrationality as a Rationale for Regulation.”](#) *Journal of Policy Analysis and Management*, Vol. 34, Issue 3 (Summer 2015). With Brian Mannix.

[“Please Don’t Regulate my Internalities.”](#) *Journal of Policy Analysis and Management*, Vol. 34, Issue 3 (Summer 2015). With Brian Mannix.

[“Will the Occupational Safety and Health Administration’s Proposed Standards for Occupational Exposure to Respirable Crystalline Silica Reduce Workplace Risk?”](#) *Risk Analysis* (Vol. 35 Issue 7, 2015). With Andrew P. Morriss

[“Improving Regulatory Accountability: Lessons from the Past and Prospects for the Future”](#) 65 *Case Western Reserve Law Review* 4 (summer 2015).

[2016 Regulators’ Budget: Increases Consistent with Growth in Fiscal Budget](#), a joint report of the GW Regulatory Studies Center and the Weidenbaum Center at Washington University in St. Louis. With Melinda Warren, May 19, 2015.

[“Stakeholder Participation and Regulatory Policymaking in the United States,”](#) draft report for the Organisation for Economic Co-operation and Development. November 2014. With Steven J. Balla.

[“Australia’s Regulatory ‘Bonfire’,”](#) *Regulation*, Vol. 37, Number 3. Fall 2014. With Jeff Bennett.

[“Tight Budgets Constrain Some Regulatory Agencies, But Not All,”](#) *Regulation*, Vol. 37, Number 3. Fall 2014. With Melinda Warren.

[“The Social Cost of Carbon,”](#) *Engage* Vol. 15, Issue 1. With Brian Mannix. July 24, 2014

[2015 Regulators’ Budget: Economic Forms of Regulation on the Rise](#), a joint report of the GW Regulatory Studies Center and the Weidenbaum Center at Washington University in St. Louis. With Melinda Warren, July 9, 2014.

[“OSHA’s Long-Awaited Silica Rule,”](#) *Regulation*, Vol. 37, Number 1. Spring 2014.

[“Comment on Löfstedt’s ‘The substitution principle in chemical regulation: a constructive critique,’”](#) *Journal of Risk Research*, January 2014.

[“Making the Social Cost of Carbon more Social,”](#) *Regulation*, Vol. 36, Number 4. Winter 2013/2014, with Brian F. Mannix and Sofie E. Miller.

[Sequester’s Impact on Regulatory Agencies Modest: An Analysis of the U.S. Budget for Fiscal Years 2013 and 2014](#), a joint report of the GW Regulatory Studies Center and the Weidenbaum Center at Washington University in St. Louis. With Melinda Warren, July 22, 2013.

[“OMB’s Reported Benefits of Regulation: Too Good to Be True?,”](#) *Regulation*, Vol. 36, Number 2. Summer 2013.

[“The EPA’s Implausible Return on its Fine Particulate Standard,”](#) *Regulation*, Vol. 36, Number 1. Spring 2013.

“Is the Execution of the Law Hyper-Partisan?” [\*The Georgetown Journal of Law & Public Policy\*](#), Vol. 10 (summer 2012)

[\*Regulation: A Primer\*](#). The George Washington University Regulatory Studies Center and the Mercatus Center at George Mason University. August 2012. With Jerry Brito.

“Perpetuating Puffery: An Analysis of the Composition of OMB’s Reported Benefits of Regulation,” [\*Business Economics\*](#), Vol. 47, No. 3. National Association for Business Economics, August 2012.

[\*Growth in Regulators’ Budget Slowed by Fiscal Stalemate: An analysis of the U.S. Budget for fiscal years 2012 and 2013\*](#), a joint report of the GW Regulatory Studies Center and the Weidenbaum Center at Washington University in St. Louis. July 2012. With Melinda Warren.

“Improving the Use of Science to Inform Environmental Regulation,” in *Institutions and Incentives in Regulatory Science*, Jason Scott Johnston, ed. Lexington Books 2012. With George M. Gray.

“In Memoriam: William A. Niskanen, [The Interview](#),” *Regulation*, Vol. 35, No. 1, Spring 2012.

“Observations on OIRA’s 30<sup>th</sup> Anniversary,” *Administrative Law Review*, Vol. 63, Special Edition 2011.

“The (Not So) New Executive Order on Regulatory Review, and What to Expect,” *Environmental Law Reporter*, June 2011. (“Dialogue” based on panel discussion.)

“[Prospects for Regulatory Reform in 2011](#),” *Engage*, Volume 12, Issue 1, June 2011.

[\*Fiscal Stalemate Reflected in Regulators’ Budget: An analysis of the U.S. Budget for fiscal years 2011 and 2012\*](#), a joint report of the GW Regulatory Studies Center and the Weidenbaum Center at Washington University in St. Louis. May 2011. With Melinda Warren.

[\*Engaging Stakeholders in Designing Regulation\*](#), a joint report of the GW Regulatory Studies Center and the Bertelsmann Stiftung, March 2011.

“[Alfred Kahn, 1917-2010](#),” *Regulation*, Vol. 34, No. 1, Spring 2011.

[\*A Decade of Growth in the Regulators’ Budget: An analysis of the U.S. Budget for fiscal years 2010 and 2011\*](#), a joint report of the GW Regulatory Studies Center and the Weidenbaum Center at Washington University in St. Louis. May 2010. With Melinda Warren.

“The Future of Cost-Benefit Analysis in Environmental Policy,” *17 U. Balt. J. Envtl. L.* 189, Spring 2010. (Based on panel discussion at the Federalist Society 2009 National Lawyers Convention)

[“Regulatory Reform: Lessons Learned, Challenges Ahead,”](#) *Regulation*, Vol. 32, Number 2, Summer 2009.

[“Regulatory Activity in the Bush Administration at the Stroke of Midnight,”](#) *Engage*, Vol. 12, Issue 2, Summer 2009.

[“The Future of Regulatory Oversight and Analysis,”](#) Resources for the Future, Weekly Commentary, June 8, 2009. With Arthur Fraas.

[“The Future of Regulatory Oversight and Analysis,”](#) Mercatus Policy Series, No. 51, May 2009. With Arthur Fraas.

[Updated Principles for Risk Analysis](#), Memorandum for the Heads of Executive Departments and Agencies, September 19, 2007. With Sharon L. Hays

“Defining What to Regulate: Silica & the Problem of Regulatory Categorization,” *Administrative Law Review*, Vol. 58, No.2 (Spring 2006). With Andrew P. Morriss.

*Moderating Regulatory Growth: An Analysis of the U.S. Budget for Fiscal Years 2006 and 2007*, a joint report of the Mercatus Center at George Mason University and the Weidenbaum Center at Washington University in St. Louis. May 2006. With Melinda Warren.

*Primer on Regulation*, Mercatus Policy Series; Policy Resource No. 1. Mercatus Center at George Mason University. November 2005.

*Upward Trend in Regulation Continues: An Analysis of the U.S. Budget for Fiscal Years 2005 and 2006*, a joint report of the Mercatus Center at George Mason University and the Weidenbaum Center at Washington University in St. Louis. June 15, 2005. With Melinda Warren.

*eRulemaking: A Case Example of eGov Transformation*, Working Paper in Regulatory Studies, Mercatus Center at George Mason University. June 13, 2005. With Richard D. Otis.

“It is Time to Reevaluate the Toxic Release Inventory,” *Missouri Environmental Law & Policy Review*, Volume 12, Number 1 (2005)

“Regulatory Review,” in *Report Card 2004: Bush Administration’s Environmental Policy*, Property and Environment Research Center. Bruce Yandle & Jane Shaw ed. October 2004.

*Regulator’s Budget Continues to Rise: An Analysis of the U.S. Budget For Fiscal Years 2004-2005*, a joint report of the Mercatus Center at George Mason University and the Weidenbaum Center at Washington University in St. Louis. July 2004. With Melinda Warren.

*Regulatory Spending Soars: An Analysis of the U.S. Budget for Fiscal Years 2003 and 2004*, a joint report of the Mercatus Center at George Mason University and the

Weidenbaum Center at Washington University in St. Louis. July 2003. With Melinda Warren.

*A Day in the Life of a Regulated American Family*, Mercatus Center at George Mason University. December 2002.

*Is 9/11 a Crisis to be Followed by a Leviathan?* Mercatus Center Policy Essay. With Bruce Yandle. September 2002.

*Regulatory Response: An Analysis of the Shifting Priorities of the U.S. Budget for Fiscal Years 2002 and 2003*, a joint report of the Mercatus Center at George Mason University and the Weidenbaum Center at Washington University in St. Louis. June 2002. With Melinda Warren.

*President Expands Oversight Of Federal Agency Rulemaking*, Washington Legal Foundation *Legal Backgrounder*, November 16, 2001. With Ernest Gellhorn, and Wendy L. Gramm.

“Reversing Midnight Regulations,” *Regulation*, Vol. 24, Number 1, Spring 2001.

“OSHA’s Ergonomics Program Standard and Musculoskeletal Disorders: An Introduction,” with Bradford DeLong, *J. Labor Research*, Volume XXII, Number 1 Winter 2001.

“The Benefits and Costs of OSHA’s Proposed Ergonomics Program Standard,” *J. Labor Research*, Volume XXII, Number 1 Winter 2001.

“A Fuel and Your Money” *Regulation*, Vol. 23, Number 3. 2000.

“EPA’s Proposed Expansion of Noncompliance Benefit Estimates,” *Environmental Claims Journal*, Volume 12, Number 2, Winter 2000, with Kent W Mikkelsen.

“Overstressing Business: OSHA and Ergonomics,” *Briefly*, NLCPI. October 1999.

“The EPA Relies on Faulty Market Incentives,” *Regulation*, 1998, Vol. 21, No. 3.

“Economic Impact Analyses,” *Pace Environmental Law Review*, Vol. 16, Number 1, Winter 1998.

“EPA’s National Ambient Air Quality Standard for Ozone May be Hazardous to Your Health,” *Environmental Law* (Illinois State Bar Association). March 1998, Vol. 28, No. 3.

“Congress and the Clinton OMB: Unwilling Partners in Regulatory Oversight?” *Regulation*, 1997, Vol. 20, No. 4 with Angela Antonelli.

“Shining a Bright Light on Regulators: Tracking the Costs and Benefits of Federal Regulation,” *Background*. No. 1142. The Heritage Foundation. September 30, 1997 with Angela Antonelli.

“OIRA’s Conflicting Double Role,” *Regulation*, 1997, Vol. 20, No. 3.

“EPA’s Ozone Standard May Harm Public Health and Welfare,” *Risk Analysis*. Vol. 17, Number 4. (August 1997).

*Using Derivatives to Manage Risk*. Edison Electric Institute 1997.

*Electricity Futures: Potential Impact on Utilities*. Edison Electric Institute 1995.

“Discounting Risky Environmental Remediation Costs,” *Environmental Claims Journal*. Vol. 7, No. 2. Winter 1994/95.

“Discounting Cash Outflows of Environmental Remediation,” *Economists Ink*. Fall 1994.

“Costs and Benefits of Pesticide Ban,” *Economists Ink*, Winter 1994.

“Pesticide Problems,” *Bio/Technology*, Vol. 11, April 1993.

“Understanding the Clean Air Act: Implementation Issues for Electric Utilities,” *Maine Policy Review*., April 1993, Vol. 2/No. 1.

*National Biotechnology Policy Board Report*, National Institutes of Health, 1992. 90 pp.

“Environmental Regulation and the Health Care Industry,” *Digest of Environmental Law*, Vol. 6, No. 1, 1993.

“The Future of Clean Air Futures,” *Public Utilities Fortnightly*, August 1, 1992.

“Clean Air Futures,” *Economists Ink*, Spring 1992.

“EPA Civil Penalty Policy,” *Economists Ink*, Fall 1991.

## **Public Interest Comments**

[“Public Interest Comment on the Office of Management and Budget’s Proposed Revisions to Circular A-4, Regulatory Impact Analysis”](#) June 14, 2023

[“Public Interest Comment: Increasing Consistency and Transparency in EPA’s Benefit Cost Analysis,”](#) July 17, 2018.

[“Public Interest Comment on The Environmental Protection Agency’s Proposed Rule Strengthening Transparency in Regulatory Science,”](#) May 18, 2018.

[“Public Comment on OMB’s 2017 Draft Report to Congress on the Benefits and Costs of Federal Regulations,”](#) April 09, 2018.

[“Public Comment on OMB’s Interim Guidance Implementing Section 2 of the Executive Order Titled ‘Reducing Regulation and Controlling Regulatory Costs’”](#) with Brian F. Mannix, Sofie E. Miller, & Daniel R. Pérez, February 13, 2017.

[“Public Comment on EPA’s Proposed Supplemental Finding that it is Appropriate and Necessary to Regulate Hazardous Air Pollutants from Coal- and Oil-Fired EGUs,”](#) January 11, 2016.

[“Public Comment: OMB’s 2015 Draft Report to Congress on the Benefits and Costs of Federal Regulations,”](#) with Sofie Miller and Brian Mannix. December 15, 2015

[“Comment on OMB’s Report to Congress on the Benefits and Costs of Federal Regulation,”](#) with Brian Mannix and Sofie Miller. September 2, 2014.

[“Retrospective Review Comment on the FMCSA’s Proposed Rule: Electronic Logging Devices and Hours of Service Supporting Documents,”](#) May 15, 2014.

[“Comment on the EPA’s Standards of Performance for New Residential Wood Heaters, New Residential Hydronic Heaters and Forced-Air Furnaces, and New Residential Masonry Heaters,”](#) May 5, 2014.

[“Public Interest Comment on the Interagency Technical Support Document: Technical Update of the Social Cost of Carbon for Regulatory Impact Analysis under Executive Order No. 12866,”](#) with Brian Mannix. February 16, 2014.

[“Public Interest Comment on the Occupational Safety and Health Administration’s Proposed Standards for Occupational Exposure to Respirable Crystalline Silica,”](#) With Andrew P. Morriss, December 4, 2013.

[Comment](#) on “Reconsideration of the Department of Energy’s Final Rule: Energy Conservation Standards for Standby Mode and Off Mode for Microwave Ovens,” with Sofie E. Miller and Brian F. Mannix. September 6, 2013.

[Comment](#) on the Occupational Safety and Health Administration’s “Proposed Standards for Occupational Exposure to Respirable Crystalline Silica,” with Andrew P. Morriss, December 4, 2013.

[Comment](#) on the OMB’s Draft 2013 “Report to Congress on the Benefits and Costs of Federal Regulations,” submitted to Office of Management and Budget, with Brian F. Mannix and Sofie E. Miller. July 23, 2013.

[Comment](#) on “OMB’s 2010 Benefit-Cost Report to Congress,” submitted to the Office of Management and Budget. With Art Fraas and Brian Mannix. June 24, 2010.

[Comment](#) on “OMB’s 2005 Benefit-Cost Report to Congress,” submitted to the Office of Management and Budget. *Public Interest Comment Series*, Regulatory Studies Program, Mercatus Center at George Mason University, June 20, 2005.

Comment on “EPA’s Proposed Willingness to Pay Survey: Phase III Cooling Water Intake Structures,” submitted to the Environmental Protection Agency. *Public Interest Comment Series*, Regulatory Studies Program, Mercatus Center at George Mason University, April 25, 2005. With Daniel Simmons.

Comment on “EPA’s Phase III Cooling Water Intake Structures,” submitted to the Environmental Protection Agency. *Public Interest Comment Series*, Regulatory Studies Program, Mercatus Center at George Mason University, January 31, 2005. With Daniel Simmons.

Comment on “Draft Report to Congress on the Costs and Benefits of Federal Regulations,” submitted to the Office of Management and Budget. *Public Interest Comment Series*, Regulatory Studies Program, Mercatus Center at George Mason University (2004-04) May 11, 2004.

Comment on “Application of the Safe Drinking Water Act to Submetered Properties,” submitted to the Environmental Protection Agency. *Public Interest Comment Series*, Regulatory Studies Program, Mercatus Center at George Mason University (2003-21), October 16, 2003.

Comment on “Cooling Water Intake,” submitted to the Environmental Protection Agency. *Public Interest Comment Series*, Regulatory Studies Program, Mercatus Center at George Mason University (2003-15) June 2, 2003. With Daniel Simmons.

Comment on “RIA Guidelines,” submitted to the Office of Management and Budget. *Public Interest Comment Series*, Regulatory Studies Program, Mercatus Center at George Mason University (2003-13) May 5, 2003. With Brian Mannix.

Comment on “Office of Management and Budget’s Draft 2003 Report to Congress on the Costs and Benefits of Federal Regulation,” submitted to the Office of Management and Budget. *Public Interest Comment Series*, Regulatory Studies Program, Mercatus Center at George Mason University (2003-11) April 29, 2003. With Brian Mannix.

Comment on “Withdrawal of TMDL Water Quality Plans,” submitted to the Environmental Protection Agency. *Public Interest Comment Series*, Regulatory Studies Program, Mercatus Center at George Mason University (2003-01), January 17, 2003.

Comment on “2002 Draft Report to Congress on the Costs and Benefits of Federal Regulation,” submitted to the Office of Management and Budget. *Public Interest Comment Series*, Regulatory Studies Program, Mercatus Center at George Mason University (2002-02) May 28, 2002. With Brian Mannix and Jennifer Zambone.

Comment on “Request for Comment on National Primary Drinking Water Regulations for Arsenic,” submitted to the Environmental Protection Agency. *Public Interest Comment Series*, Regulatory Studies Program, Mercatus Center at George Mason University (2001-14) October 31, 2001.

Comment on “2001 Draft Report to Congress on the Costs and Benefits of Federal Regulation,” submitted to the Office of Management and Budget. *Public Interest Comment Series*, Regulatory Studies Program, Mercatus Center at George Mason University (2001-12), August 14, 2001. With Jay Cochran and Joseph Johnson.

Comment on “National Primary Drinking Water Regulations; Arsenic and Clarifications to Compliance and New Source Contaminants Monitoring,” submitted to the Environmental Protection Agency. *Public Interest Comment Series*, Regulatory Studies Program, Mercatus Center at George Mason University (2001-5), May 7, 2001.

Addendum to comment on “Energy Conservation Program for Consumer Products: Clothes Washer Energy Conservation Standards,” submitted to the Department of Energy. *Public Interest Comment Series*, Regulatory Studies Program, Mercatus Center at George Mason University (2000-23), December 4, 2000.

Comment on “Proposed rule on the Accidental Release Prevention Requirements; Risk Management Programs Under the Clean Air Section 112(r) (7); Distribution of Off-Site Consequence Analysis Information,” submitted to the Environmental Protection Agency. *Public Interest Comment Series*, Regulatory Studies Program, Mercatus Center at George Mason University (2000-12), June 8, 2000. With Daniele Schiffman.

Comment on “U. S. Postal Service’s Proposed Delivery of Mail to a Commercial Mail Receiving Agency,” submitted to the United States Postal Service. *Public Interest Comment Series*, Regulatory Studies Program, Mercatus Center at George Mason University (2000-9), April 13, 2000.

Comment on “Report to Congress on the Costs and Benefits of Federal Regulations,” submitted to the Office of Management and Budget. *Public Interest Comment Series*, Regulatory Studies Program, Mercatus Center at George Mason University (2000-2), January 19, 2000.

Comment on “Lead and Lead Compounds; Lowering of Reporting Thresholds; Community Right-to Know Toxic Chemical Release Reporting; Proposed Rule. 40 CFR Part 372,” submitted to the Environmental Protection Agency. *Public Interest Comment Series*, Regulatory Studies Program, Mercatus Center at George Mason University (1999-13), December 15, 1999.

Comment on “Draft Guidance for Improving Air Quality Using Economic Incentive Programs,” submitted to the Environmental Protection Agency. *Public Interest Comment Series*, Regulatory Studies Program, Mercatus Center at George Mason University (1999-12), December 10, 1999.

Comment on “Control of Air Pollution from New Motor Vehicles: Proposed Tier 2 Motor Vehicle Emissions Standards and Gasoline Sulfur Control Requirements, Provision of Supplemental Information and Request for Comment. (64 FR 57827),” submitted to the Environmental Protection Agency. *Public Interest Comment Series*, Regulatory Studies Program, Mercatus Center at George Mason University (1999-11), December 1, 1999.

Comment on “Calculation of the Economic Benefit of Noncompliance in EPA’s Civil Penalty Enforcement Cases: Notice (BEN),” submitted to the Environmental Protection Agency. *Public Interest Comment Series*, Regulatory Studies Program, Mercatus Center at George Mason University (1999-9), September 30, 1999.

Comment on “Control of Air Pollution from New Motor Vehicles: Proposed Tier 2 Motor Vehicle Emissions Standards and Gasoline Sulfur Control Requirements,” submitted to the Environmental Protection Agency. *Public Interest Comment Series*, Regulatory Studies Program, Mercatus Center at George Mason University (1999-7), July 23, 1999.

Comment on “29 CFR 1910 Subpart U – Ergonomics, ‘Working Draft of a Proposed Ergonomics Program Standard,’” submitted to the Department of Labor, Occupational Safety and Health Administration. *Public Interest Comment Series*, Regulatory Studies Program, Mercatus Center at George Mason University (1999-6), July 16, 1999. With Dianna Rowan.

Comment on “Procedures for Predetermination of Wage Rates; Labor Standards Provisions Applicable to Contracts Covering Federally Financed and Assisted Construction and to Certain Nonconstruction Contracts; Proposed Rule,” submitted to the Department of Labor. *Public Interest Comment Series*, Regulatory Studies Program, Mercatus Center at George Mason University (1999-5), June 9, 1999. With John Charles Bradbury.

Comment on “Environmental Enforcement and Compliance Assurance Activities,” submitted to the Environmental Protection Agency. *Public Interest Comment Series*, Regulatory Studies Program, Mercatus Center at George Mason University (1999-3), April 16, 1999.

Comment on “Persistent Bioaccumulative Toxic Chemicals – Toxic Release Inventory (TRI),” submitted to the Environmental Protection Agency. *Public Interest Comment Series*, Regulatory Studies Program, Mercatus Center at George Mason University (1999-2), April 1, 1999.

Comment on “Minimum Security Devices and Procedures and Bank Secrecy Act (‘Know Your Customer’),” submitted to the Federal Deposit Insurance Corporation. *Public Interest Comment Series*, Regulatory Studies Program, Mercatus Center at George Mason University (1999-1), March 8, 1999.

Comment on “Federal Motor Vehicle Safety Standards: Occupant Crash Protection, Advanced Air Bags,” submitted to the National Highway Traffic Safety Administration. *Public Interest Comment Series*, Regulatory Studies Program, Mercatus Center at George Mason University (1998-4), December 17, 1998.

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