How to prepare a public comment letter

Submitting public comments to agencies and elected officials is one of the most important ways you can engage in government and exercise your right to have a say in public policy. But if you’ve never done this before, it can be intimidating! Here are 6 basic tips on how to write a public comment letter.

**Follow the 5-paragraph essay format.** Remember writing essays for your high school English class? Follow the same flow in your letter:

* one introductory paragraph,
* three body paragraphs with support and development, and
* one concluding paragraph.

You can follow this model, and if you have more to say than just three paragraphs, keep expanding the body.

1. **The intro.** Introduce yourself and why you care about this issue. How will it impact you? Use specific examples if you can.
2. **The body.** There are three strategies that can help give force to your comments: pounding the law, pounding the facts, and then pounding the table. If you are writing a 5paragraph essay with 3 body paragraphs, you can devote one paragraph to each strategy. If you write more than 5 paragraphs, divide the body of your letter into sections based on the topic, and address each topic in this order.
   1. **Pound the law**. A government document can have two types of legal problems: it may omit or inadequately address something that is required by law, or the action proposed in the document could violate the law. Either is a good issue to raise. If possible, specifically describe or quote and cite the legal language. You can also focus on high level points*– talk about the policies that support your position and share your personal values.*
   2. **Pound the facts.** The document could have three types of factual problems: facts are presented incorrectly, facts are left out, or facts are included but not given adequate consideration. You can find facts by searching the internet, the library, or asking experts. Make sure your sources are solid, and cite to sources. Be sure to address trade-offs and opposing views in your comment. You can also raise policy and/or procedural concerns and consequences.
   3. **Pound the table.** This generally means critiquing the process or people involved in producing the document, or tugging at heartstrings by raising ideological or personal opinions.
3. **Clearly Organize Your Comment**. Clearly identify the issues in the proposed regulation on which you are commenting. You can do this by using titles for each paragraph or section based on the main topic or point you’re making. If you are commenting on a particular word, phrase or sentence in the document, provide the page number, column, and paragraph citation from the federal register document.
4. **Err on the side of inclusion**: Raise as many relevant issues as you can, with as much factual, legal, policy backup as you can, to show problems with the proposal. The agency must respond! The more relevant arguments against a proposal that you can raise in the comments, the more points the agency will have to deal with in its final statement of basis and purpose, thereby increasing the chances of finding a hook to convince a court to scrap the Rule.
5. **Suggest Alternatives.** If you disagree with a proposed action, suggest an alternative or alternatives (including not regulating at all, or withdrawing a rule) and include an explanation of how the alternative might meet the same objective or be more effective.

Last but not least, have fun! It’s exciting and challenging to share your concerns with those that make the rules. Remember: the first three words of the United States Constitution – “We The People” – affirm that the government of the United States exists to serve its citizens.

YOUR OPINION MATTERS!