



# AMERICANS FOR LIMITED GOVERNMENT

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December 10, 2012

Centers for Medicare & Medicaid Services  
Department of Health and Human Services  
Attention: CMS-9980-P  
P.O. Box 8010,  
Baltimore, MD 21244-8010

Submitted Via Regulations.gov

**RE: CMS-9980-P, Standards Related to Essential Health Benefits,  
Actuarial Value, and Accreditation, Request for 30 Day Extension of  
Comment Period**

To Whom it May Concern:

I write today to request an extension to the comment period of the regulatory action noted above. By using an extraordinarily short comment period of 30 days the Department flagrantly ignores Sec. 6(a)(1) of Executive Order 12866 which states in relevant part:

In addition, each agency should afford the public a meaningful opportunity to comment on any proposed regulation, which in most cases should include a comment period of **not less than 60 days**. (*Emphasis added.*)

The Department has cited no reason for its deviation from the mandates of Executive Order 12866 and in fact did not even acknowledge that the 60 day period specified in the order exists. While in exigent circumstances there might be reason to have a comment period of less than 60 days the Department has provided no evidence supporting a short comment period.

Furthermore, given the large number of new regulatory actions that are being undertaken by the Administration since the November elections, a longer comment period on this rulemaking will better enable members of the public and the affected

community to provide detailed comments while not sacrificing their ability to comment on all regulatory actions that affect them.

Based on the foregoing I request that the Department extend the comment period on this rulemaking for an additional 30 days.

Sincerely,

A handwritten signature in blue ink, appearing to read "William Wilson", with a stylized flourish extending to the right.

William Wilson  
President