



November 27, 2018

Office of Science and Technology Policy  
Eisenhower Executive Office Building  
1650 Pennsylvania Avenue, N. W.  
Washington, DC 20460

Re: Notice of Proposed Rulemaking and Request for Public Comment: *Implementing the Freedom of Information Act*

Dear Sir or Madam,

The Association of Metropolitan Water Agencies (AMWA) welcomes the opportunity to comment on the Office of Science and Technology Policy's (OSTP) proposed rulemaking for implementing the Freedom of Information Act (FOIA), issued on October 31, 2018. AMWA is an organization of the nation's largest publicly owned drinking water utilities, and our members provide drinking water service to more than 156 million people.

AMWA appreciates OSTP's work to clarify and improve upon the processes for responding to FOIA requests. In particular, AMWA supports OSTP's proposal to increase the period of time in which a requester may appeal an adverse determination from 30 days to 90 days, as well as the proposal requiring the agency to inform requesters of their right to seek dispute resolution services. AMWA appreciates that OSTP defines the expectations and duties of the FOIA public liaison, as this makes the position more transparent and understandable to the public. Ensuring that the public has the necessary assistance to navigate the FOIA process is invaluable and AMWA encourages OSTP, once the rule is finalized, to help ensure that these positions are fully supported throughout the various federal agencies.

AMWA thanks OSTP for the opportunity to comment. If you have any questions, please contact Stephanie Hayes Schlea (schlea@amwa.net), AMWA's Manager of Regulatory and Scientific Affairs.

Sincerely,

Diane VanDe Hei  
Chief Executive Officer

cc: Peter Grevatt, Director, Office of Ground Water and Drinking Water

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