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RULES CLEARINGHOUSE

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CLEARINGHOUSE RULE 97-028

Comments

[NOTE: All citations to “Manual” in the comments below are to the Administrative Rules Procedures Manual, prepared by the Revisor of Statutes Bureau and the Legislative Council Staff, dated October 1994.]

2. Form, Style and Placement in Administrative Code

- a. It appears as if the rule should create s. SB 3.08 (4) (i), not s. SB 3.08 (2) (i). The text of the rule and the relating clause should be changed to reflect the appropriate citations.
- b. The agency uses the notation “DFI-SB” as a prefix, but the Administrative Code, including ch. SB 3, continues to use only the prefix “SB.” An explanation would be helpful.

3. Conflict With or Duplication of Existing Rules

The agency may wish to review the rule in light of s. SB 3.08 (3) which appears to exclude “loans, loan receivables and equity investments” from liquid assets. How can this section be reconciled with the rule that permits savings banks’ investment in marketable securities to be considered liquid assets?

5. Clarity, Grammar, Punctuation and Use of Plain Language

A description in the analysis prepared by the agency of the intended meaning of “the top 4 highest categories” used by a nationally recognized rating service would clarify the intended scope of the requirement in the rule.