WISCONSIN LEGISLATIVE COUNCIL
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CLEARINGHOUSE RULE 01−110

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 September 1998.]

2. Form, Style and Placement in Administrative Code

a. The acronym "IBC" is used in s. Comm 70.02 (2) (e). This term should be defined.

b. In s. Comm 70.06 (1) (intro.), "as follows:" should replace "in accordance with pars. (a) or (b)."

c. In s. Comm 70.17 (5), "~~Change~~" should replace "~~Changed~~" in order to accurately reflect the current term. Also, the new defined term should be underscored.

d. It is inappropriate drafting style to repeal a provision and renumber other provisions in the same SECTION. See SECTIONS 11 and 25. Also, while SECTION 11 repeals s. Comm 70.11 (17), SECTION 13 repeals and recreates the same subsection. Finally, will the current definition of "remodeled" be needed in sub. (18), since a definition of "remodel" is created in sub. (17)?

e. In s. Comm 70.21 (1) (intro.), "as follows:" should replace "as described in pars. (a) to (c)."

f. In Table 70.22-6, hyphens should not be used in "2 hours" and "1 hour."

g. "NA" is defined after Table 70.23. Should this be drafted as a note? Rather than using "NA," could "not applicable" simply be placed in the table?

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

a. The phrase "totally preserved" is used in s. Comm 70.06 (2). Is the distinction between a building that is "totally preserved" and one that is "preserved" clear?

b. The language of s. Comm 70.29 (3) could be modified to provide that "fire escapes shall ***conform with*** the prevailing code."

c. Are "loses" and "hydration" the proper terms, and consistent with each other, in s. Comm 70.40 (3) (b)?