



WISCONSIN LEGISLATIVE COUNCIL RULES CLEARINGHOUSE

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CLEARINGHOUSE RULE 09-113

Comments

[NOTE: All citations to “Manual” in the comments below are to the Administrative Rules Procedures Manual, prepared by the Legislative Reference Bureau and the Legislative Council Staff, dated September 2008.]

2. Form, Style and Placement in Administrative Code

- a. In s. Trans 148.02 (1), the full term represented by the acronym should be stated first within quotation marks and then the acronym within quotation marks should follow. In addition, it would be helpful to provide a cross-reference to ch. Trans 156.
- b. References to the federal “driver privacy protection act” should not be capitalized.
- c. In s. Trans 148.06 (2) (a) 1. (intro.), the phrase “any of” should be inserted before the phrase “the following.”
- d. In s. Trans 148.06 (3) (b), the phrase “is required to” should be replaced by the word “shall.”
- e. In s. Trans 148.07 (2) (b) (intro.), the word “all” should be inserted after the word “consists.”

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

- a. In the rule preface statement of the analysis and supporting documentation used to determine the effect of the rule on small businesses, the word “a” should be inserted before the phrase “by non-individual secured party” in the first paragraph.

b. In s. Trans 148.03 (5), the last sentence should be clarified by specifically stating what the secured party will process and identifying the action that triggers the 30-day window for processing.

c. In s. Trans 148.06 (2) (a) 1. b., the phrase “If the” should be replaced by the word “The.”

d. Section Trans 148.06 (2) (a) 2. should be rephrased to read in the active voice. For example, it could state: “The secured party has failed or refused to provide DMV with any documents....”

e. In s. Trans 148.07 (2) (a), the reference to submittal to DMV “by a customer service center” is awkward. It appears that it would be clearer to state an application is submitted “, through a customer service center,”. See also s. Trans 148.07 (2) (d).

f. In s. Trans 148.08 (2), it appears that the word “as” should be replaced by the word “and.”