

My thoughts - My opinion and thoughts on the developments of the petition's status after speaking with Paul Hoffman :

I think that Mr. Hoffman is squarely behind the petition's changes, but he isn't the only person involved in the process. It isn't realistic to expect him to be able to snap his fingers and magically approve the petition. On the other hand, any "controversy" generated by this petition, which I pointed out infringes on off duty LE as well, is easily overcome by the good it accomplishes. The petition addresses the regulations defects, strikes a good balance and gives them a solid justification to publish for comment - it's there, submitted correctly, given sufficient time, it's not frivolous, and has good backing. I think that the thrust of his position is to be patient, they have put it in the hopper and they are going to undertake publishing the petition's amended regulation for comment - he has discretion to alter it, deny it, sit on it, so all things considered, he is being forthright by committing to do this and that should not be undervalued. Don't sell this short.

Overwhelmingly, the petitioners feel some movement from the department is in order in the immediacy - without affecting the petition's status. In other words, if the petition must be delayed then the petitioners are asking the department for some concessions. First, the petitioners including supporters in congress want a commitment to the supporting congressional offices that the petition will be followed up on by December, 2006 - that is to say review completed, getting published for comment .

And we don't feel that some sort of concession while the petition is being reviewed is unrealistic. Mr. Hoffman has agreed to personally take This under advisement and see if there is anything which could be done Without making an interim regulation change, which would still bring scrutiny

We agreed to stay in touch on the matter.

Overall, I believe that we are not that far apart, only having (amicable) disagreement On the time table for the petitions posting to the federal register for comment. I think That we are well served to not browbeat DOI or Mr. Hoffman too bad since they could Have rejected the petition. While I think that DOI could and should publish the petition Immediately for comment, I don't think it makes sense to snatch defeat from the jaws Of victory. I believe they will follow through, but we will have to maintain scrutiny of this Project until that actually happens.