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January 14, 2014

Jessica Karls-Ruplinger, Senior Attorney
Administrative Rules Clearinghouse
Wisconsin Legislative Council
One East Main Street, Suite 401
Madison, WI 53702

Dear Ms. Karls-Ruplinger:

Per our telephone conversation, please place this letter in the file for CR 14-001, and please include the following underlined language in your consideration of the plain language analysis of the draft proposed rule.

Section 9 clarifies existing prohibitions against conducting or participating in events occurring without permits. Prohibition against participating in events is redefined in accordance with recent settlement. Clarity to the sub-section is sought by separating the violations for conducting such events from violations for participating in such events into separate sub-sections. The potential offense of occupying space is clarified by removing excess language from the paragraph. Additionally, introductory statements, which do not constitute elements leading to a citation, are moved to the appropriate introductory clause for the section. Finally, a new paragraph is added, codifying a decibel limitation currently found in policy, and lowering it in accordance with an expert witness report commissioned by the Wisconsin Department of Justice.

Thank you for your cooperation in this matter.

Sincerely,

Mark A. Herman
Assistant Legal Counsel