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October 27, 2014

RE: Department of Interior
Revision of PL 102-477 Agency Forms request for comments

The Pueblo of Zuni is submitting the following comments:

After review of the proposed P.L. 102-477 reporting forms, we oppose to the manner and content of the recent notice as defective and request that the notice be republished or the comment period be extended. The short time frame of 30 days is not adequate for thorough review and comment to address concerns raised by the forms. Based on 102-477 Tribal Work Group meetings, the DOI took nearly six months to respond to comments and has revised the forms in some area based on comments submitted by tribes.

The form and content of the September 26 notice is defective as the notice does not provide sufficient or correct information regarding the proposed forms, and does not provide access to all necessary information to allow response to the notice. The notice indicates that the collected information can be reviewed online at www.reginfo.gov by following instructions to review DOI collections. However, there is no clarity of directions or instructions at the site to allow easy access to the proposed documents.

The forms included are obsolete and should not be a part of the information collection package. Version 1 of the statistical report, identified as 1076-0135 that is referenced on the website is not the appropriate form. The current revised form includes three categories of participants: adults, youth and cash assistance should be inclusive of this notice.

The proposed 477 Financial Report and instructions indicates to "refer to cost category definitions to determine appropriate placement of expenditure per category (see attached)" is not attached and not included in the ICR documents. The forms are required as part of public document for review and comment.

Based on errors found in the September 26 notice regarding specific forms which will be used, the difficulty in locating approved forms on reginfo.gov and the misinformation presented, the Pueblo of Zuni requests that the notice be republished with adequate documentation and

provides additional time for access to data and respond with appropriate comments before OMB approves the forms.

Regards,



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Cc: ZECDC Program File FY 14-15