Policy Influence: Do Public Pressure Campaigns Influence Bureaucratic Policymaking?

Appendix and Replication Code

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(R code is only in the HTML version)

1 Data

Replication data are available in SQL and Rdata at https://github.com/judgelord/rulemaking.

```
load(here::here("data", "rules_metadata.Rdata"))


rules %<>% mutate(year = str_sub(posted_date, 1,4) %>% as.numeric())


# alternatively
#rules <- dbGetQuery(con, "SELECT * FROM rules")


#FIXME REPLACE WITH date
d <- rules  %>%
  filter(year > 2004, year < 2021, document_type %in% c("Proposed Rule", "Rule"))


load(here::here("data", "comments_min.Rdata"))
```

```r
# add docket_id
comments_min %<>%
  mutate(docket_id = id %>% str_remove("-[0-9]*$"))

# hand coded
load(here::here("data", "coalitions_coded.Rdata"))
load(here::here("data", "comments_coded.Rdata"))
# load(here::here("data", "mass_coded.Rdata"))

# common names
comments_coded %<>%
  mutate(coalition = coalition_comment,
         agency = str_remove(docket_id, "-.*"))%>%
  mutate(org_name = org_name %>% str_to_title())%>%
  mutate(coalition = coalition %>% str_to_title())

# common names
coalitions_coded %<>%
  mutate(coalition = coalition_comment,
         comments = coalition_comments,
         Comments = Coalition_comments,
         agency = str_remove(docket_id, "-.*"))%>%
  mutate(coalition = coalition %>% str_to_title())

# coalitions_coded %<>% mutate(across(where(is.character, str_to_title))

# TODO merge in mass comments that were not hand-coded
```

These data currently include 212516 dockets, 134927 rulemaking dockets from 1909 to 2020. These dockets received approximately 99329768 comments.

This analysis relies on rulemaking dockets from 2005 through 2020. These 44583 rulemaking dockets received 75614762 comments.

1.1 Clustering with text reuse

My theoretical approach requires that I *attribute* form letter comments to the organizations, campaigns, and broader coalitions that mobilized them. To do so, I identify comments that share text. I find that a 10-word phrase repeated across more than a few comments is always either text copied from the proposed policy or a form letter provided by a campaign. Thus, for the text of each comment, I first remove all 10-word phrases that appear in the proposed rule (including the preamble and call for comments). Then, I identify all comments that share ten-word phrases with 99 or more other comments. Finally, I collapse these form letter comments to one representative document for hand-coding.

For each comment on a rulemaking docket, I identify the percent of words it shares with other comments using a 10-word (or "10-gram") moving window function, looping over each possible pair of texts to identify matches.[Where a new presidential administration used the same docket number to solicit c more about n-gram window functions and comparisons with related partial matching methods such as the Smith-Waterman algorithm, see Casas, Denny and Wilkerson 2017: and Judge-Lord (2017).) When actors sign onto the same comment, it is clear that they are lobbying together. However, various businesses, advocacy groups, and citizens often comment separately, even when they are aligned. Text-reuse (using the same ten-word phrases) captures this alignment.

Figure 1 shows the percent of shared text for a sample of 50 comments on the Consumer Financial Protection Bureau's 2016 Rule regulating Payday Loans. Comments are arranged by the document identifier assigned by regulations.gov on both axes. The black on

the diagonal indicates that each document has a perfect overlap with itself. Black squares off the diagonal indicate additional pairs of identical documents. For example, 100% of the words from Comment 95976 are part of some tengram that also appears in 95977 because the exact same comment was uploaded twice. The cluster of grey tiles indicates a coalition of commenters using some identical text. Comments 91130 through 91156 are all partial or exact matches. All are part of a mass comment campaign by Access Financial. The percent of the identical text is lower than many mass-comment campaigns because these are hand-written comments, but the n-gram method still picks up overlap in the OCRed text in the header and footer. Tengrams that appear in 100 or more comments indicate a mass comment campaign. Some agencies use similar "de-duping" software [CITE] and only provide a representative sample comment. In these cases, my linking method assumes that the example comment is representative, and I link these comments to others based on the text of the sample comment provided.

```
knitr::include_graphics(here::here("Figs", "comment_percent_match_plot-1.png")  )
```

1.2 Hand-coded sample

To estimate the influence of public comments on policy, I code almost all* comments on a random sample of rules, recording the type of organization, the lobbying coalition to which each belongs, the type of coalition (primarily public or private interests), their policy demands, and the extent to which the change between draft and final rule aligned with their demands. This level of alignment between policy asks and policy outcomes is my measure of lobbying success. It does not identify a causal relationship–true policy influence, but it is state of the art with these kinds of observational data (see Yackee and Yackee (2006)).

*On each selected rule, I code all comments submitted as file attachments or emails, but only some comments typed in a text box. I include comments typed in a text box if they share text with other comments (see above). This includes nearly all comments on most

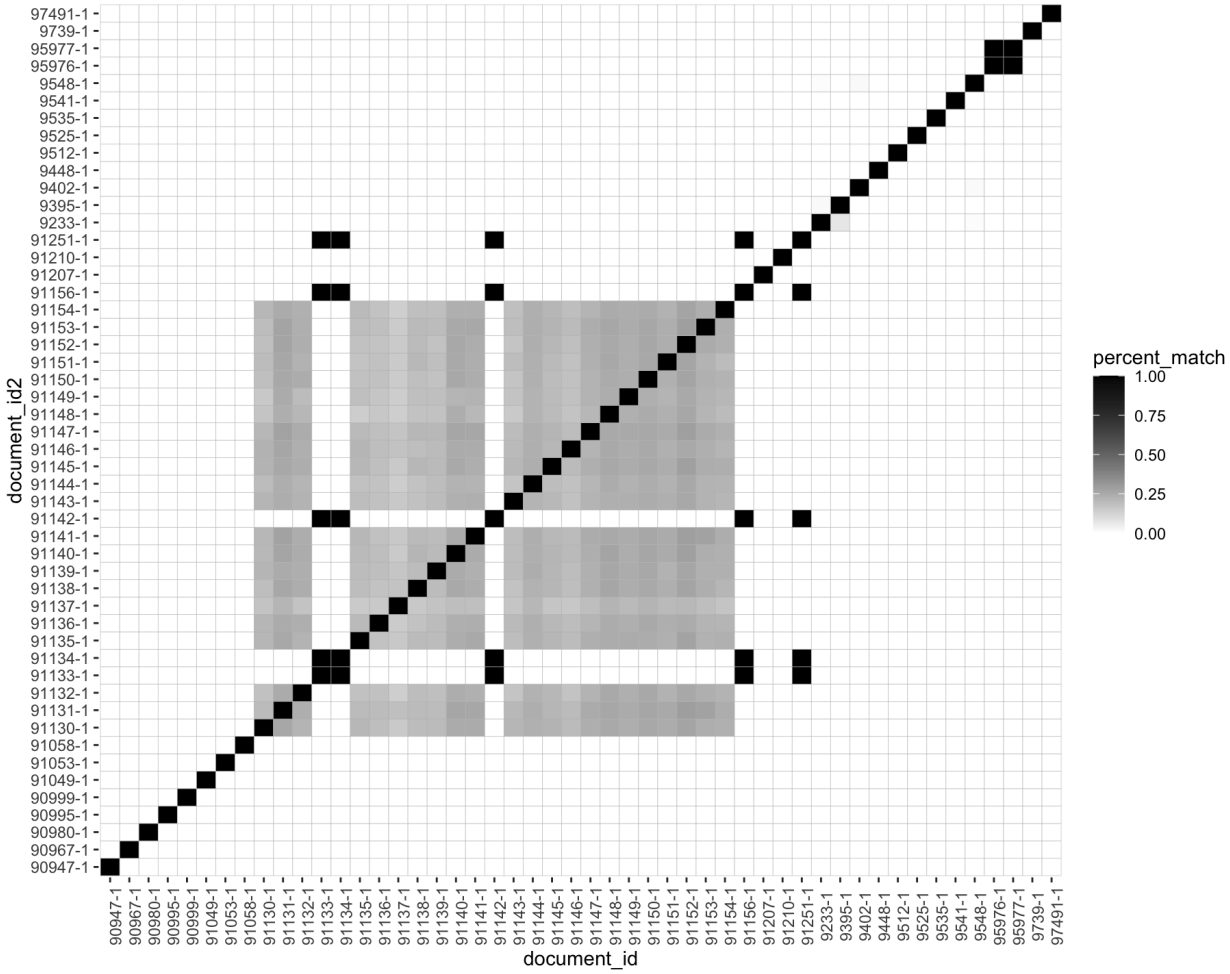


Figure 1: Percent of Matching Text in a Sample of Public Comments

rules, excluding entirely unique text-box content, which is marginal qualitatively and quantitatively. For comments sharing text, I code one sample document for all versions of the form letter.

My approach to measuring lobbying success starts with policy demands raised in comments. I code the general regulatory/deregulatory direction of the policy change, but the dimensions of conflict on which I judge lobbying success are those identified by commenters. They do not emerge from a reading of the policy or not any a priori concept. Instead, I read the change between draft and policy with an eye for alignment with commenters' requests (including requests that specific parts of the draft policy do not change.)

My approach of identifying the dimensions of the conflict by comments has benefits and downsides. Compared to other potential measures of success, it is more likely to focus on things that commenters care about. For example, one could measure success by the number of times a comment is mentioned in the agency's response to comments. However, this may capture strategic responsiveness by agencies choosing to discuss some issues more than others. It also counts explicit rejections toward the measure of responsiveness. One could also measure success by focusing on a-priory potential aspects of the policy. Balla et al. (2020) count five factors: (1) the number of regulated entities, (2) number of activities or substances being regulated, (3) the level of pollution standards, (4) the compliance and effective deadlines of the regulation, and (5) the monitoring and reporting requirements. Each takes one value (increasing or decreasing), and each is weighted equally in the analysis. In contrast, starting with comments allows commenters to highlight the issues they care most about.

1.2.1 By organization

Organization-level data sample:

```
comments_coded %>%
  dplyr::select(document_id, comment_type, comments, starts_with(c("org_", "coalition"))
```

```
  group_by(coalition_comment) %>%
  slice(n = 2) %>%
  kablebox()
```

document_id

comment_type

comments

org_name

org_type

org_lead

coalition_comment

coalition_type

coalitions

coalition_unopposed

coalition_congress

coalition_size

coalition_position

coalition_business

coalition_success

coalition_leader_success

coalition_comments

coalition_id

Coalition_size

Coalition_comments

Coalition_Position

coalition

DOT-OST-2011-0044-0291

org

1

American Aviation Institute

ngo;thinktank

TRUE

aai

public

5

FALSE

0

2

1.000000

0

-2.0000000

-2.0000000

2

1

2-10

2-10

Opposes rule

Aai

FEMA-2016-0003-0170

org

1

State Of Alaska

gov;state

TRUE

aasa

public

10

FALSE

0

15

1.000000

0

2.0000000

2.0000000

16

2

11-100

11-100

Opposes rule

Aasa

CFPB-2019-0022-5924

mass

1

NA

NA

TRUE

aca international

private

6

FALSE

0

48

4.521739

57

0.3333333

0.3333333

69

3

11-100

11-100

Supports rule

Aca International

WHD-2019-0003-12782

org

1

National Association Of Home Builders

corp;group

TRUE

acg

private

3

FALSE

0

23

4.000000

0

1.8750000

1.8750000

24

4

11-100

11-100

Supports rule

Acg

NPS-2018-0007-71052

org

1

Institute For Free Speech

ngo;advocacy

TRUE

aclu

public

4

FALSE

1

57

1.013158

0

1.9672131

1.9672131

76

5

11-100

11-100

Opposes rule

Aclu

ICEB-2015-0002-41564

org

1

Southeast Missouri State University

ngo;university

TRUE

afl-cio

public

6

FALSE

0

5

5.000000

2

1.0000000

1.0000000

5

7

2-10

2-10

Supports rule

Afl-Cio

FWS-HQ-NWRS-2012-0086-0094

org

1

Alaska Oil And Gas Association

corp group

TRUE

alaska oil and gas association

private

3

FALSE

0

5

1.800000

3

-0.4000000

-0.4000000

5

10

2-10

2-10

Opposes rule

Alaska Oil And Gas Association

DEA-2018-0005-1537

org

1

Association For Accessible Medicines

corp group

TRUE

ama

public

4

FALSE

0

2

4.000000

1

2.0000000

2.0000000

2

11

2-10

2-10

Supports rule

Ama

ED-2016-OESE-0032-19253

NA

1

New York State Council Of School Superintendents

NA

FALSE

american association of school administrstors

public

18

FALSE

0

8

NaN

0

NaN

NaN

8

14

2-10

2-10

NA

American Association Of School Administrstors

CFPB-2019-0022-9597

org

1

Aldridge Pite Haan Llp

corp;law firm

TRUE

american bar association

public

6

FALSE

1

26

2.535714

0

1.1666667

1.1666667

28

16

11-100

11-100

Opposes rule

American Bar Association

PHMSA-2012-0082-0327

org

1

Dakota Gasification Company

corp

TRUE

american petroleum institute

private

7

FALSE

0

209

1.563380

104

-0.4956522

-0.4956522

214

19

More than 100

More than 100

Opposes rule

American Petroleum Institute

NOAA-NMFS-2013-0101-1828

org

1

Forked River Tuna Club

ngo;membership

TRUE

american sportfishing association

private

5

FALSE

0

5

5.000000

1

0.0000000

0.0000000

1542

22

2-10

More than 100

Supports rule

American Sportfishing Association

IRS-2016-0015-0141

mass

1

American Federation Of Government Employees

gov;federal

TRUE

americans for tax fairness

public

4

FALSE

0

9

4.888889

0

2.0000000

2.0000000

29853

24

2-10

More than 100

Supports rule

Americans For Tax Fairness

WHD-2019-0001-59320

org

1

Partnership For Medicaid Home Based Care

corp;small corp

TRUE

ancor

private

6

FALSE

0

10

5.000000

0

NaN

NaN

12

26

2-10

11-100

Supports rule

Ancor

CEQ-2019-0003-346818

org

1

Cahto Tribe

gov; tribe

FALSE

association of american indian affairs

private

7

FALSE

0

41

2.790698

0

-1.1428571

-1.1428571

43

29

11-100

11-100

Opposes rule

Association Of American Indian Affairs

BSEE-2017-0008-0595

org

1

Dnv Gl

corp

FALSE

auditors

private

4

FALSE

0

3

2.000000

1

-0.6666667

-0.6666667

3

33

2-10

2-10

Opposes rule

Auditors

CFPB-2016-0025-211877

org

1

Michigan Cbc Host Committee

corp

TRUE

axcess financial

private

6

FALSE

0

106

1.321101

57

-0.6029412

-0.6029412

112

34

More than 100

More than 100

Opposes rule

Axcess Financial

PHMSA-2012-0082-0317

org

1

Village Of Elburn

gov;local

FALSE

barrington and illinois trac coalition

public

7

FALSE

0

118

4.808000

4

-0.6129032

-0.6129032

125

36

More than 100

More than 100

Supports rule

Barrington And Illinois Trac Coalition

USCBP-2007-0064-0358

org

1

International Flying Samaritans

ngo;service;advocacy

TRUE

bbp

public

3

FALSE

0

20

1.550000

7

-1.2000000

-1.2000000

23

38

11-100

11-100

Opposes rule

Bbp

DOI-2015-0005-4423

org

1

Kapolei Community Development Corporation

corp

FALSE

big autonomy

public

6

FALSE

0

7

4.750000

2

2.0000000

2.0000000

8

39

2-10

2-10

Supports rule

Big Autonomy

DOI-2015-0005-4332

org

1

Democratic Party Of Hawaii Hawaiian Affairs Caucus

ngo; political party

FALSE

blanket crew

public

6

FALSE

0

14

4.071429

1

2.0000000

2.0000000

14

40

11-100

11-100

Supports rule

Blanket Crew

NOAA-NMFS-2013-0101-1881

org

1

Diane Marie Fishery

corp

TRUE

blue water fishermen's association

private

5

FALSE

0

3

1.666667

2

-2.0000000

-2.0000000

3

42

2-10

2-10

Opposes rule

Blue Water Fishermen's Association

USCG-2010-0990-1744

org

1

Aep River Operations

corp;transportation

FALSE

boatus

public

3

FALSE

0

5

2.333333

2

-1.0000000

-1.0000000

6

43

2-10

2-10

Opposes rule

Boatus

FWS-HQ-ES-2018-0097-107766

mass

72178

Humane Society

ngo

TRUE

center for biological diversity

public

7

FALSE

0

39

1.193548

0

-1.3255814

-1.3255814

856518

48

11-100

More than 100

Opposes rule

Center For Biological Diversity

NOAA-NMFS-2018-0035-0319

org

1

Center For Sportfishing Policy

corp group;coalition

TRUE

center for sportfishing policy

private

5

FALSE

0

6

1.333333

1

-2.0000000

-2.0000000

6

50

2-10

2-10

Opposes rule

Center For Sportfishing Policy

TREAS-DO-2007-0015-0032

org

1

Center For Regulatory Effectiveness

corp;thinktank

FALSE

chamber of commerce

private

20

FALSE

0

4

1.200000

1

-0.6000000

-0.6000000

5

51

2-10

2-10

Opposes rule

Chamber Of Commerce

DOT-OST-2011-0044-0737

org

1

Air Transport Association Of America, Inc., International Air Transport Association, Regional Airline Association And Air Carrier Association Of America

corp;group

TRUE

cma

public

5

FALSE

0

17

4.000000

0

2.0000000

2.0000000

17

56

11-100

11-100

Supports rule

Cma

NOAA-NMFS-2008-0096-0019

org

1

United National Fishermen's Assoc.

corp group;ngo

FALSE

commercial fishers and processors

private

13

FALSE

0

13

2.692308

6

-0.2857143

-0.2857143

13

58

11-100

11-100

Opposes rule

Commercial Fishers And Processors

NOAA-NMFS-2013-0050-0030

org

1

Portland Fish Exchange

ngo

FALSE

commercial fishing

private

8

FALSE

0

6

3.571429

5

0.8571429

0.8571429

7

59

2-10

2-10

Supports rule

Commercial Fishing

FWS-HQ-ES-2018-0097-57575

org

1

Montezuma County

gov;local

TRUE

congressional sportsmen's foundation

private

7

FALSE

0

37

3.864865

2

1.7333333

1.7333333

37

64

11-100

11-100

Supports rule

Congressional Sportsmen's Foundation

TREAS-DO-2007-0015-0112

elected

1

Congressman Joe Pitts

congress;joseph r. pitts; mike pence; doug lamborn; joe wilson; phil gingrey; john t. doolittle; wally herger; w. todd akin; marilyn musgrave; bob goodlatte roger wicker; mark souder roscoe bartlett

FALSE

congressmen

public

20

FALSE

0

1

4.000000

0

2.0000000

2.0000000

1

65

1

1

Supports rule

Congressmen

TREAS-DO-2007-0015-0091

org

1

Consumer Bankers Association

corp group

TRUE

consumer bankers association

private

20

FALSE

0

2

2.000000

1

2.0000000

2.0000000

2

69

2-10

2-10

Opposes rule

Consumer Bankers Association

TREAS-DO-2007-0015-0087

org

1

Corporate One Federal Credit Union

ngo;credit union

FALSE

credit unions

private

20

FALSE

0

2

2.000000

0

-2.0000000

-2.0000000

2

71

2-10

2-10

Opposes rule

Credit Unions

FWS-HQ-ES-2018-0006-64000

mass

100

Oregon Wild

ngo;advocacy

TRUE

defenders of wildlife

public

5

FALSE

0

88

1.138889

0

-1.6666667

-1.6666667

440844

73

11-100

More than 100

Opposes rule

Defenders Of Wildlife

ED-2016-OESE-0032-13667

org

1

South Dakota Department Of Education

gov;state

FALSE

department of education

public

18

FALSE

0

19

3.500000

0

NaN

NaN

20

74

11-100

11-100

Supports rule

Department Of Education

USCIS-2010-0017-12455

org

1

Department For Professional Employees, Afl-Cio

ngo;union

TRUE

dpe afl-cio

public

3

FALSE

0

2

1.000000

0

-2.0000000

-2.0000000

2

79

2-10

2-10

Opposes rule

Dpe Afl-Cio

FWS-R9-ES-2008-0093-0495

org

1

Environmental Defense Fund

ngo;advocacy

TRUE

earthjustice

public

6

FALSE

0

97

1.024590

0

-1.7826087

-1.7826087

122

81

11-100

More than 100

Opposes rule

Earthjustice

USCBP-2007-0064-2108

org

1

Bahamas Hotel Association

corp group

TRUE

ebaa

public

3

FALSE

0

5

2.600000

3

-1.2000000

-1.2000000

5

84

2-10

2-10

Opposes rule

Ebaa

NOAA-NMFS-2008-0096-0085

mass

1

Pew

ngo;environmental;pressure

FALSE

environmental community

public

13

FALSE

0

15

4.950000

0

-0.9090909

-0.9090909

20

90

11-100

11-100

Supports rule

Environmental Community

WHD-2019-0001-0052

org

1

Chatmoss Country Club

corp;small corp

TRUE

epi

public

6

FALSE

0

55

1.000000

0

-1.0000000

-1.0000000

60

93

11-100

11-100

Opposes rule

Epi

CFPB-2016-0025-147205

org

1

Equifax

corp

TRUE

equifax

private

6

FALSE

0

1

5.000000

2

1.0000000

1.0000000

2

95

1

2-10

Supports rule

Equifax

ICEB-2015-0002-40752

org

1

NA

ngo;membership;advocacy;pressure group

TRUE

fair

public

6

FALSE

0

1

1.000000

0

-2.0000000

-2.0000000

2

97

1

2-10

Opposes rule

Fair

TREAS-DO-2007-0015-0063

mass

1

Family Research Council

ngo;faith

TRUE

family research council

public

20

FALSE

0

6

5.000000

0

2.0000000

2.0000000

6

98

2-10

2-10

Supports rule

Family Research Council

FWS-HQ-ES-2018-0097-57575

org

1

Montezuma County

gov;local

TRUE

farm bureau

private

7

FALSE

0

45

3.943396

17

1.9166667

1.9166667

53

99

11-100

11-100

Supports rule

Farm Bureau

FWS-R9-ES-2008-0093-7786

org

1

Minerals Management Service

gov;federal

TRUE

federal emergency management agency

public

6

FALSE

0

2

3.500000

0

-0.5000000

-0.5000000

2

100

2-10

2-10

Supports rule

Federal Emergency Management Agency

NOAA-NMFS-2013-0050-0128

org

1

Fisheries Survival Fund

ngo

TRUE

fisheries survival fund

private

8

FALSE

0

3

3.666667

1

2.0000000

2.0000000

3

102

2-10

2-10

Supports rule

Fisheries Survival Fund

NOAA-NMFS-2012-0059-0153

org

1

Maine Coast Fishermen's Association

ngo

FALSE

fishing industry

private

6

FALSE

0

12

4.833333

7

-1.1666667

-1.1666667

12

103

11-100

11-100

Supports rule

Fishing Industry

CEQ-2019-0003-172544

org

1

George Washington University Regulatory Studies Center

ngo;university

TRUE

george washington university regulatory studies center

NA

7

FALSE

0

1

5.000000

0

-2.0000000

-2.0000000

1

108

1

1

Supports rule

George Washington University Regulatory Studies Center

ED-2016-OESE-0032-11931

org

1

Down Syndrome Indiana, Inc.

ngo;advocacy

FALSE

global down syndrome foundation

public

18

FALSE

0

4

4.333333

0

1.0000000

1.0000000

5

109

2-10

2-10

Supports rule

Global Down Syndrome Foundation

BSEE-2012-0005-0027

org

1

State Of Alaska

gov;state

FALSE

government

public

5

FALSE

0

2

5.000000

0

-1.0000000

-1.0000000

2

110

2-10

2-10

Supports rule

Government

FWS-HQ-ES-2018-0097-80560

org

1

Nez Perce Tribal Executive Committee

gov;tribe;ej

FALSE

great lakes indian fish and wildlife commission

public

7

FALSE

0

5

1.400000

0

-1.0000000

-1.0000000

5

113

2-10

2-10

Opposes rule

Great Lakes Indian Fish And Wildlife Commission

TREAS-DO-2007-0015-0029

org

1

Sport View Television Corporation

corp

FALSE

greyhound racing industry

private

20

FALSE

0

7

1.000000

7

-0.8000000

-0.8000000

7

114

2-10

2-10

Opposes rule

Greyhound Racing Industry

NOAA-NMFS-2018-0035-0330

org

1

Ocean Conservancy

ngo;advocacy

TRUE

gulf restoration network

public

5

FALSE

0

11

1.000000

0

-1.9000000

-1.9000000

28488

115

11-100

More than 100

Opposes rule

Gulf Restoration Network

DEA-2018-0005-1133

org

1

Vizient

corp;membership;health care

TRUE

hsca

public

4

FALSE

0

9

1.666667

2

-1.7777778

-1.7777778

9

117

2-10

2-10

Opposes rule

Hsca

FWS-HQ-ES-2018-0097-59136

org

1

Oregon Department Of Fish And Wildlife

gov;state

FALSE

hunters

private

7

FALSE

0

25

3.880000

0

1.8000000

1.8000000

25

118

11-100

11-100

Supports rule

Hunters

FEMA-2016-0003-0200

org

1

Kentucky Division Of Emergency Management

gov;state

TRUE

iaem-usa

public

10

FALSE

0

20

2.000000

0

2.0000000

2.0000000

23

119

11-100

11-100

Opposes rule

Iaem-Usa

PHMSA-2012-0082-1960

org

1

Canadian Association Of Railway Suppliers

corp group

FALSE

international

public

7

FALSE

0

2

5.000000

1

1.6666667

1.6666667

3

122

2-10

2-10

Supports rule

International

ED-2016-OESE-0032-10992

mass

1

Boone County Schools

gov;local

FALSE

kentucky coalition for advancing education

public

18

FALSE

0

9

NaN

0

1.0000000

1.0000000

9

126

2-10

2-10

NA

Kentucky Coalition For Advancing Education

OSHA-H005C-2006-0870-1962

org

1

Kimberly-Clark Professional

corp;corp

TRUE

kimberly-clark

public

5

FALSE

0

5

3.600000

0

0.4000000

0.4000000

5

128

2-10

2-10

Supports rule

Kimberly-Clark

CEQ-2019-0003-173043

mass

50

Liuna

NA

TRUE

liuna

private

7

FALSE

0

112

4.533333

2

0.5333333

0.5333333

2892

130

More than 100

More than 100

Supports rule

Liuna

NOAA-NMFS-2013-0050-0137

org

1

Maine Department Of Marine Resources

gov;state

TRUE

maine department of marine resources

public

8

FALSE

0

1

3.500000

0

2.0000000

2.0000000

2

131

1

2-10

Supports rule

Maine Department Of Marine Resources

NOAA-NMFS-2008-0096-0074

org

1

Environmental Defense Fund

ngo;environmental

FALSE

marine fish conservation network

public

13

FALSE

0

3

5.000000

0

-1.6666667

-1.6666667

3

133

2-10

2-10

Supports rule

Marine Fish Conservation Network

TREAS-DO-2007-0015-0110

org

1

American Bankers Association

corp group

TRUE

mastercard

private

20

FALSE

0

5

1.500000

6

-1.3333333

-1.3333333

6

135

2-10

2-10

Opposes rule

Mastercard

OCC-2020-0026-0256

org

1

Innovative Lending Platform Association

corp group

TRUE

mla

private

3

FALSE

0

12

3.916667

8

2.0000000

2.0000000

12

142

11-100

11-100

Supports rule

Mla

CFPB-2016-0025-208735

elected

1

Senator Kimberly Lightford

illinois senate district 4

TRUE

naacp

public

6

FALSE

4

68

1.328571

3

0.0317460

0.0317460

70

148

11-100

11-100

Opposes rule

Naacp

CFPB-2019-0006-3621

org

1

Legal Services Advocacy Project

ngo;legal;advocacy

FALSE

naca

public

12

FALSE

2

71

1.077922

3

-1.8000000

-1.8000000

77

149

11-100

11-100

Opposes rule

Naca

CFPB-2019-0006-22265

org

1

Minnesota Credit Union Network

ngo;credit union

TRUE

nafcu

private

12

FALSE

0

9

3.333333

2

0.4444444

0.4444444

9

150

2-10

2-10

Supports rule

Nafcu

ICEB-2015-0002-7242

mass

1

NA

NA

TRUE

nafsa

public

6

FALSE

0

56

4.435185

10

1.1607143

1.1607143

109

151

11-100

More than 100

Supports rule

Nafsa

ED-2016-OESE-0032-19481

NA

1

Fayette County Board Of Education

NA

FALSE

national association of state board of education

public

18

FALSE

0

7

NaN

0

NaN

NaN

7

154

2-10

2-10

NA

National Association Of State Board Of Education

ED-2016-OESE-0032-14344

NA

1

Nebraska Catholic Conference

NA

FALSE

national association of state catholic conference directors

private

18

FALSE

0

3

6.000000

0

NaN

NaN

3

155

2-10

2-10

Supports rule

National Association Of State Catholic Conference Directors

ED-2016-OESE-0032-3293

NA

1

Department For Education, Office Of Catholic Schools/Diocese Of Columbus

NA

FALSE

national association of state. catholic conference directors

private

18

FALSE

0

2

NaN

0

NaN

NaN

2

156

2-10

2-10

NA

National Association Of State. Catholic Conference Directors

FWS-HQ-ES-2018-0006-54714

org

1

Southern Ute Indian Tribe

gov;tribe;ej

TRUE

national congress of american indians

public

5

FALSE

0

13

1.230769

0

-0.5000000

-0.5000000

13

158

11-100

11-100

Opposes rule

National Congress Of American Indians

ED-2016-OESE-0032-13748

org

1

Connecticut Education Association

ngo;advocacy

FALSE

national education association

public

18

FALSE

0

9

3.500000

0

NaN

NaN

10

159

2-10

2-10

Supports rule

National Education Association

FWS-R9-ES-2008-0093-6974

org

1

Friends Of Oceano Dunes

ngo

TRUE

national endangered species act reform coalition

private

6

FALSE

0

47

4.433962

21

0.2857143

0.2857143

53

160

11-100

11-100

Supports rule

National Endangered Species Act Reform Coalition

FWS-HQ-ES-2018-0007-60048

org

1

National Environmental Banking Association

corp group

TRUE

national environmental banking association

private

4

FALSE

0

1

4.000000

1

-2.0000000

-2.0000000

1

161

1

1

Supports rule

National Environmental Banking Association

NOAA-NOS-2013-0091-0074

org

1

University Of Wisconsin System

ngo;university

TRUE

national marine sanctuary foundation

public

4

FALSE

0

16

4.263158

1

2.0000000

2.0000000

19

162

11-100

11-100

Supports rule

National Marine Sanctuary Foundation

BSEE-2017-0008-0595

org

1

Dnv Gl

corp

TRUE

national society of professional engineers

private

4

FALSE

0

3

2.000000

1

-0.6666667

-0.6666667

3

163

2-10

2-10

Opposes rule

National Society Of Professional Engineers

CFPB-2019-0022-9163

org

1

Native American Financial Services Association

ngo;tribe

TRUE

native american financial services association

NA

6

FALSE

0

1

1.000000

0

-2.0000000

-2.0000000

1

164

1

1

Opposes rule

Native American Financial Services Association

FWS-HQ-ES-2018-0097-80560

org

1

Nez Perce Tribal Executive Committee

gov;tribe;ej

FALSE

native americans

public

7

FALSE

0

5

1.400000

0

-1.0000000

-1.0000000

5

165

2-10

2-10

Opposes rule

Native Americans

USCG-2010-0990-1889

org

1

Ri Party And Charter Boat Association

corp group

FALSE

nbf

public

3

FALSE

0

2

1.000000

1

-2.0000000

-2.0000000

2

166

2-10

2-10

Opposes rule

Nbf

USCIS-2010-0017-12451

org

1

National Council Of Asian Pacific Americans

ngo;coaltion;advocacy

TRUE

ncapa

public

3

FALSE

0

2

4.500000

0

2.0000000

2.0000000

2

167

2-10

2-10

Supports rule

Ncapa

WHD-2019-0001-59330

org

1

National Community Pharmacists Association

corp;group

TRUE

ncpa

private

6

FALSE

0

15

4.000000

0

2.0000000

2.0000000

15

168

11-100

11-100

Supports rule

Ncpa

FEMA-2016-0003-0253

org

1

Louisiana Governor's Office Of Homeland Security And Emergency Preparedness

gov;state

TRUE

ncsl

public

10

FALSE

0

2

1.000000

0

2.0000000

2.0000000

2

169

2-10

2-10

Opposes rule

Ncsl

CFPB-2016-0025-211911

org

1

Germania Credit Union

ngo;credit union

TRUE

ncua

public

6

FALSE

0

63

2.272727

4

0.0952381

0.0952381

66

170

11-100

11-100

Opposes rule

Ncua

FEMA-2016-0003-0177

org

1

State Of Arizona Department Of Emergency And Military Affairs

gov;state

TRUE

nema

public

10

FALSE

0

38

2.886364

2

1.0000000

1.0000000

44

172

11-100

11-100

Opposes rule

Nema

NOAA-NMFS-2012-0059-0089

org

1

Pacific Fishery Management Council

gov;federal;regional

TRUE

new england fishery management council

public

6

FALSE

0

9

4.666667

0

-1.3333333

-1.3333333

9

174

2-10

2-10

Supports rule

New England Fishery Management Council

OSHA-H005C-2006-0870-1703

elected

1

Congressman Robert A. Brady

house-pa

FALSE

newport news

public

5

FALSE

0

22

4.833333

0

1.0357143

1.0357143

30

176

11-100

11-100

Supports rule

Newport News

WHD-2019-0001-59231

org

1

National Association Of Convenience Stores

corp;group

FALSE

nfib

private

6

FALSE

0

1

5.000000

0

NaN

NaN

1

177

1

1

Supports rule

Nfib

USCG-2010-0990-1192

org

1

National Marine Manufacturers Association

corp group

TRUE

nmma

public

3

FALSE

0

3

4.000000

1

2.0000000

2.0000000

4

180

2-10

2-10

Supports rule

Nmma

NOAA-NOS-2013-0091-0058

org

1

North Pacific Fishery Management Council

gov;federal;regional

TRUE

north pacific fishery management council

NA

4

FALSE

0

1

2.000000

0

1.0000000

1.0000000

1

182

1

1

Opposes rule

North Pacific Fishery Management Council

NOAA-NMFS-2013-0050-0025

org

1

Northeast Hook Fisherman's Association

corp group

TRUE

northeast seafood coalition

private

8

FALSE

0

6

3.571429

5

0.8571429

0.8571429

7

183

2-10

2-10

Supports rule

Northeast Seafood Coalition

FEMA-2016-0003-0263

org

1

Natural Resource Defense Council/American Rivers

ngo;advocacy;ej

TRUE

nrdc

public

10

FALSE

0

9

5.000000

3

-2.0000000

-2.0000000

11

185

2-10

11-100

Supports rule

Nrdc

FEMA-2016-0003-0208

org

1

Illinois Emergency Management Agency

gov;state

TRUE

nreca

public

10

FALSE

0

32

1.277778

4

2.0000000

2.0000000

36

186

11-100

11-100

Opposes rule

Nreca

NOAA-NOS-2013-0091-0151

org

1

American Petroleum Institute And National Ocean Industries Association

corp group

FALSE

ocean industries

private

4

FALSE

0

2

2.000000

2

-2.0000000

-2.0000000

2

187

2-10

2-10

Opposes rule

Ocean Industries

BSEE-2012-0005-0069

org

1

Ipaa

corp group

TRUE

offshore operators committee

private

5

FALSE

0

32

1.394737

22

0.8620690

0.8620690

38

188

11-100

11-100

Opposes rule

Offshore Operators Committee

DOI-2015-0005-0018

org

1

Grassroot Institute Of Hawaii

ngo; advocacy

FALSE

orwell watch

public

6

FALSE

0

2

1.000000

0

-2.0000000

-2.0000000

2

192

2-10

2-10

Opposes rule

Orwell Watch

TREAS-DO-2007-0015-0072

org

1

The Depository Trust & Clearing Corporation

corp group

FALSE

other banks

private

20

FALSE

0

13

2.384615

9

0.3846154

0.3846154

13

193

11-100

11-100

Opposes rule

Other Banks

ED-2016-OESE-0032-13504

org

1

Missouri Pta

ngo;advocacy

FALSE

parent teacher association

public

18

FALSE

0

7

5.000000

1

1.0000000

1.0000000

7

197

2-10

2-10

Supports rule

Parent Teacher Association

CEQ-2019-0003-172067

mass

91604

Partnership Project

NA

TRUE

partnership project

public

7

FALSE

1

114

1.167832

0

-1.7647059

-1.7647059

400089

198

More than 100

More than 100

Opposes rule

Partnership Project

BSEE-2013-0011-0027

individual

1

Oasis Earth

NA

TRUE

pew

public

4

FALSE

0

13

4.692308

0

-0.7500000

-0.7500000

13

200

11-100

11-100

Supports rule

Pew

NOAA-NMFS-2013-0101-2237

mass

1

Environmental Action

ngo;pressure group

TRUE

pew charitable trusts

public

5

FALSE

0

60

4.984849

1

-0.5625000

-0.5625000

168293

202

11-100

More than 100

Supports rule

Pew Charitable Trusts

DEA-2018-0005-1555

org

1

Pharmaceutical Research And Manufacturers Of America

corp group

TRUE

phrma

public

4

FALSE

0

3

3.000000

1

0.6666667

0.6666667

3

203

2-10

2-10

Supports rule

Phrma

WHD-2019-0001-59287

org

1

Pennsylvania Department Of Labor & Industry

gov;state

TRUE

ppwo

public

6

FALSE

0

26

5.000000

0

-2.0000000

-2.0000000

27

204

11-100

11-100

Supports rule

Ppwo

ED-2016-OESE-0032-11745

org

1

River Vale Public School District

elected;superintendent

FALSE

public schools

public

18

FALSE

0

21

5.000000

0

NaN

NaN

22

206

11-100

11-100

Supports rule

Public Schools

NOAA-NMFS-2008-0096-0018

org

1

Recreational Fishing Alliance

ngo;corp group

FALSE

recreational fishers

private

13

FALSE

0

5

3.000000

2

-0.4000000

-0.4000000

5

208

2-10

2-10

Supports rule

Recreational Fishers

NOAA-NMFS-2018-0035-0319

org

1

Center For Sportfishing Policy

corp group;coalition

FALSE

recreational fishing

private

5

FALSE

0

6

1.333333

1

-2.0000000

-2.0000000

6

209

2-10

2-10

Opposes rule

Recreational Fishing

NOAA-NMFS-2012-0059-0093

org

1

North Pacific Fishery Managemetn Council

gov;federal;regional

FALSE

regional councils

public

6

FALSE

0

9

4.666667

0

-1.3333333

-1.3333333

9

210

2-10

2-10

Supports rule

Regional Councils

NOAA-NMFS-2008-0096-0012

org

1

South Atlantic Fishery Management Council

gov;federal;regional

FALSE

regional fishery management councils

public

13

FALSE

0

8

3.000000

0

0.1250000

0.1250000

8

211

2-10

2-10

Supports rule

Regional Fishery Management Councils

DOI-2015-0005-0023

org

1

Kingdom Of Hawai'i

ngo; advocacy

FALSE

royalty

public

6

FALSE

0

2

2.333333

0

0.0000000

0.0000000

3

214

2-10

2-10

Opposes rule

Royalty

BSEE-2013-0011-0007

org

1

Shell Exploration & Production Company

corp;energy

TRUE

shell

private

4

FALSE

0

88

2.244444

29

-1.2727273

-1.2727273

90

217

11-100

11-100

Opposes rule

Shell

WHD-2019-0003-0017

elected

1

Congresswoman Alma S. Adams

house-nc

TRUE

shrm

public

3

FALSE

0

23

5.000000

1

0.9600000

0.9600000

25

218

11-100

11-100

Supports rule

Shrm

PHMSA-2012-0082-0202

mass

1

Sierra Club

ngo;pressure;membership

TRUE

sierra club

public

7

FALSE

0

24

5.000000

0

-1.2272727

-1.2272727

330381

219

11-100

More than 100

Supports rule

Sierra Club

NPS-2018-0007-1091

org

1

Smithsonian Institution

ngo;museum

TRUE

smithsonian

public

4

FALSE

0

3

1.333333

0

2.0000000

2.0000000

3

221

2-10

2-10

Opposes rule

Smithsonian

OSHA-H005C-2006-0870-1597

org

1

American Dental Association

ngo;professional

TRUE

southern company

public

5

FALSE

0

15

3.000000

0

0.6666667

0.6666667

15

224

11-100

11-100

Supports rule

Southern Company

BSEE-2012-0005-0027

org

1

State Of Alaska

gov;state

TRUE

state of alaska

public

5

FALSE

0

2

5.000000

0

-1.0000000

-1.0000000

2

227

2-10

2-10

Supports rule

State Of Alaska

DOI-2015-0005-4291

org

1

Ko‘Olaupoko Hawaiian Civic Club

ngo; advocacy

FALSE

support and assist

public

6

FALSE

0

11

4.727273

0

2.0000000

2.0000000

11

230

11-100

11-100

Supports rule

Support And Assist

NOAA-NMFS-2013-0050-0128

org

1

Fisheries Survival Fund

ngo

FALSE

sustainable fisheries

private

8

FALSE

0

3

3.666667

1

2.0000000

2.0000000

3

231

2-10

2-10

Supports rule

Sustainable Fisheries

ED-2016-OESE-0032-13782

org

1

Federation For Community Schools-Children's Home + Aid

ngo;advocacy

FALSE

the coalition for comuninty schools

public

18

FALSE

0

2

5.000000

0

NaN

NaN

2

234

2-10

2-10

Supports rule

The Coalition For Comuninty Schools

CFPB-2019-0006-5496

elected

1

Alcee Hastings; Collin Peterson; Henry Cuellar

house-fl

FALSE

thrifty loans

private

12

FALSE

3

16

4.111111

7

1.5294118

1.5294118

18

238

11-100

11-100

Supports rule

Thrifty Loans

PHMSA-2012-0082-1960

org

1

Canadian Association Of Railway Suppliers

corp group

FALSE

transport canada

public

7

FALSE

0

2

5.000000

1

1.6666667

1.6666667

3

239

2-10

2-10

Supports rule

Transport Canada

CFPB-2019-0006-28008

individual

1

Results

ngo;charity

FALSE

true

public

12

FALSE

0

45

1.617021

0

-1.3863636

-1.3863636

47

240

11-100

11-100

Opposes rule

True

OFCCP-2014-0004-0071

org

1

International Bancshares Corporation

corp;corp

TRUE

u.s. chamber of commerce

private

4

FALSE

0

13

1.000000

0

1.6923077

1.6923077

13

241

11-100

11-100

Opposes rule

U.s. Chamber Of Commerce

OFCCP-2014-0004-0037

org

1

Boston Women's Workforce Council

ngo;advocacy

TRUE

united brotherhood of carpenters and joiners of america

public

4

FALSE

0

7

5.000000

0

-0.5000000

-0.5000000

7

245

2-10

2-10

Supports rule

United Brotherhood Of Carpenters And Joiners Of America

MSHA-2011-0001-0140

org

1

Appalachian Citizens' Law Center

ngo;legal

TRUE

united mine workers of america

public

3

FALSE

0

4

4.500000

0

1.0000000

1.0000000

4

246

2-10

2-10

Supports rule

United Mine Workers Of America

FEMA-2016-0003-0246

org

1

Air Worldwide

corp

FALSE

usrc

public

10

FALSE

0

10

2.272727

1

1.6363636

1.6363636

11

248

2-10

11-100

Opposes rule

Usrc

ICEB-2015-0002-41442

org

1

The University Of Colorado Boulder

ngo;university

TRUE

verizon

public

6

FALSE

0

3

3.000000

1

0.3333333

0.3333333

3

250

2-10

2-10

Supports rule

Verizon

CFPB-2016-0025-211870

org

1

Civil Justice, Inc.

ngo;membership;advocacy

TRUE

wcbc

public

6

FALSE

0

141

4.831081

4

0.7627119

0.7627119

148

251

More than 100

More than 100

Supports rule

Wcbc

NOAA-NMFS-2012-0059-0153

org

1

Maine Coast Fishermen's Association

ngo

TRUE

west coast seafood processors association

private

6

FALSE

0

12

4.833333

7

-1.1666667

-1.1666667

12

252

11-100

11-100

Supports rule

West Coast Seafood Processors Association

WHD-2019-0001-59303

org

1

World Floor Covering Association

corp;group

TRUE

wfca

private

6

FALSE

0

54

4.981482

0

1.5000000

1.5000000

54

254

11-100

11-100

Supports rule

Wfca

MSHA-2011-0001-0005

org

1

Alamo Cement

corp;corp

TRUE

wyoming mining association

private

3

FALSE

0

38

2.219512

0

-1.4500000

-1.4500000

41

257

11-100

11-100

Opposes rule

Wyoming Mining Association

NPS-2018-0007-43625

individual

1

NA

NA

TRUE

NA

NA

4

FALSE

0

2

1.076923

0

NaN

NaN

13

NA

2-10

11-100

Opposes rule

NA

Summary counts:

```
# org comments by type
comments_coded %>% filter(comment_type == "org") %>%
  mutate(org_type = str_remove(org_type, ";.*")) %>%
  count(org_type, sort =T) %>%
  filter(n>1) %>%
  kablebox()
```

org_type

n

ngo

1555

gov

672

corp

499

corp group

463

NA

25

org

8

elected

4

corp groups

2

```
# org comments by sub-type
comments_coded %>% filter(comment_type == "org") %>%
  filter(str_detect(org_type, ";")) %>%
  mutate(org_type_detailed = org_type) %>%
  count(org_type_detailed, sort =T) %>%
  kablebox()
```

org_type_detailed

n

ngo;advocacy

422

gov;local

209

gov;state

203

corp;group

92

ngo;legal

91

ngo;credit union

66

ngo;professional

66

ngo;university

52

ngo; advocacy

47

ngo;coalition

47

gov;tribe

45

gov;tribe;ej

38

corp;corp

36

ngo;faith

35

ngo;membership

35

gov;federal

34

ngo;union

33

gov;federal;regional

25

ngo;thinktank

23

corp;law firm

22

ngo;advocacy;membership

20

corp group;coalition

17

ngo;membership;advocacy

17

corp;bank

15

gov;local;coalition

15

ngo;legal;advocacy

15

corp;legal

14

corp;small corp

14

ngo;legal;membership

14

ngo;environmental

13

ngo;pressure group

13

corp;energy

11

ngo;think tank

10

ngo;philanthropy

9

corp; bank

8

ngo; credit union

8

ngo; environmental advocacy

8

ngo;advocacy;professional

8

ngo;professional;membership

8

gov; state

7

gov;state agency

7

ngo;advocacy;coalition

7

corp group;energy

6

corp group;professional

6

ngo;advocacy;ngo;membership

6

ngo;healthcare

6

corp group; trade association

5

corp group;membership;professional

5

gov; tribe

5

gov;state;coalition

5

ngo;advocacy;pressure group

5

ngo;ej

5

ngo;trade association

5

ngo;tribe

5

corp group;membership

4

corp;thinktank

4

gov; county

4

gov;city

4

gov;county

4

gov;local;ej

4

gov;local;ngo

4

gov;local;tribe;ej

4

gov;state;agency

4

gov;state;ej

4

ngo; environemental advocacy

4

ngo;advocacy;legal

4

ngo;medical

4

ngo;membership;pressure

4

ngo;tribe;ej;advocacy

4

ngo;university;legal

4

corp;busines

3

corp;gov;tribal;ej

3

corp;medical

3

gov; local

3

gov;local; court

3

ngo;

3

ngo; environemental protection

3

ngo; volunteer

3

ngo;advocacy;ej

3

ngo;advocacy;ngo

3

ngo;coalition;advocacy

3

ngo;corp group

3

ngo;education

3

ngo;federal credit union

3

ngo;financial services

3

ngo;legal;university

3

org;finance

3

corp group; advoacy

2

corp group; bank

2

corp group; chamber of commerce

2

corp group; energy

2

corp group; farmers

2

corp group; natural resoruces; mining association

2

corp group; ranchers

2

corp group;association; livestock

2

corp group;ngo

2

corp group;professional;membership

2

corp; oil and gas

2

corp;consultants

2

corp;consulting

2

1.2.2 By coalition

Coalition-level data sample:

```
coalitions_coded %>% ungroup() %>% group_by(docket_id) %>%
  slice_max(coalition_comments, n = 2) %>%
  dplyr::select(docket_id, starts_with("coalition")) %>%
  distinct() %>%
  kablebox()
```

docket_id

coalition_comment

coalition_type

coalitions

coalition_unopposed

coalition_congress

coalition_size

coalition_position

coalition_business

coalition_success

coalition_leader_success

coalition_comments

coalition_id

Coalition_size

Coalition_comments

Coalition_Position

coalition

BSEE-2012-0005

pew

public

5

FALSE

0

4

4.750000

0

1.5000000

1.5000000

1530

200

2-10

More than 100

Supports rule

Pew

BSEE-2012-0005

offshore operators committee

private

5

FALSE

0

32

1.394737

22

0.8620690

0.8620690

38

188

11-100

11-100

Opposes rule

Offshore Operators Committee

BSEE-2013-0010

shell

private

1

TRUE

0

1

1.000000

0

-2.0000000

-2.0000000

1

217

1

1

Opposes rule

Shell

BSEE-2013-0011

shell

private

4

FALSE

0

88

2.244444

29

-1.2727273

-1.2727273

90

217

11-100

11-100

Opposes rule

Shell

BSEE-2013-0011

pew

public

4

FALSE

0

13

4.692308

0

-0.7500000

-0.7500000

13

200

11-100

11-100

Supports rule

Pew

BSEE-2017-0008

center for biological diversity

public

4

FALSE

0

22

1.041667

0

-2.0000000

-2.0000000

59410

48

11-100

More than 100

Opposes rule

Center For Biological Diversity

BSEE-2017-0008

american petroleum institute

private

4

FALSE

0

7

3.571429

5

0.2857143

0.2857143

7

19

2-10

2-10

Supports rule

American Petroleum Institute

BSEE-2018-0002

earthjustice

public

4

FALSE

0

23

1.074074

0

-1.8947368

-1.8947368

71627

81

11-100

More than 100

Opposes rule

Earthjustice

BSEE-2018-0002

american petroleum institute

private

4

FALSE

0

27

4.500000

22

0.2222222

0.2222222

28

19

11-100

11-100

Supports rule

American Petroleum Institute

CEQ-2019-0003

partnership project

public

7

FALSE

1

114

1.167832

0

-1.7647059

-1.7647059

400089

198

More than 100

More than 100

Opposes rule

Partnership Project

CEQ-2019-0003

liuna

private

7

FALSE

0

112

4.533333

2

0.5333333

0.5333333

2892

130

More than 100

More than 100

Supports rule

Liuna

CFPB-2016-0025

wcbc

public

6

FALSE

0

141

4.831081

4

0.7627119

0.7627119

148

251

More than 100

More than 100

Supports rule

Wcbc

CFPB-2016-0025

axcess financial

private

6

FALSE

0

106

1.321101

57

-0.6029412

-0.6029412

112

34

More than 100

More than 100

Opposes rule

Axcess Financial

CFPB-2019-0006

naca

public

12

FALSE

2

71

1.077922

3

-1.8000000

-1.8000000

77

149

11-100

11-100

Opposes rule

Naca

CFPB-2019-0006

true

public

12

FALSE

0

45

1.617021

0

-1.3863636

-1.3863636

47

240

11-100

11-100

Opposes rule

True

CFPB-2019-0006

true

NA

12

FALSE

0

45

1.617021

0

-1.3863636

-1.3863636

47

240

11-100

11-100

Opposes rule

True

CFPB-2019-0006

true

private

12

FALSE

0

45

1.617021

0

-1.3863636

-1.3863636

47

240

11-100

11-100

Opposes rule

True

CFPB-2019-0022

naacp

public

6

FALSE

3

119

1.079096

4

-0.7407407

-0.7407407

177

148

More than 100

More than 100

Opposes rule

Naacp

CFPB-2019-0022

aca international

private

6

FALSE

0

48

4.521739

57

0.3333333

0.3333333

69

3

11-100

11-100

Supports rule

Aca International

DEA-2018-0005

hsca

public

4

FALSE

0

9

1.666667

2

-1.7777778

-1.7777778

9

117

2-10

2-10

Opposes rule

Hsca

DEA-2018-0005

phrma

public

4

FALSE

0

3

3.000000

1

0.6666667

0.6666667

3

203

2-10

2-10

Supports rule

Phrma

DOI-2015-0005

blanket crew

public

6

FALSE

0

14

4.071429

1

2.0000000

2.0000000

14

40

11-100

11-100

Supports rule

Blanket Crew

DOI-2015-0005

support and assist

public

6

FALSE

0

11

4.727273

0

2.0000000

2.0000000

11

230

11-100

11-100

Supports rule

Support And Assist

DOT-OST-2011-0044

cma

public

5

FALSE

0

17

4.000000

0

2.0000000

2.0000000

17

56

11-100

11-100

Supports rule

Cma

DOT-OST-2011-0044

aai

public

5

FALSE

0

2

1.000000

0

-2.0000000

-2.0000000

2

1

2-10

2-10

Opposes rule

Aai

ED-2016-OESE-0032

public schools

public

18

FALSE

0

21

5.000000

0

NaN

NaN

22

206

11-100

11-100

Supports rule

Public Schools

ED-2016-OESE-0032

public schools

NA

18

FALSE

0

21

5.000000

0

NaN

NaN

22

206

11-100

11-100

Supports rule

Public Schools

FEMA-2016-0003

pew

public

10

FALSE

0

217

4.103139

1

-1.8918919

-1.8918919

2982

200

More than 100

More than 100

Supports rule

Pew

FEMA-2016-0003

nema

public

10

FALSE

0

38

2.886364

2

1.0000000

1.0000000

44

172

11-100

11-100

Opposes rule

Nema

FWS-HQ-ES-2018-0006

defenders of wildlife

public

5

FALSE

0

88

1.138889

0

-1.6666667

-1.6666667

440844

73

11-100

More than 100

Opposes rule

Defenders Of Wildlife

FWS-HQ-ES-2018-0006

national endangered species act reform coalition

private

5

FALSE

0

76

4.197368

36

0.2222222

0.2222222

76

160

11-100

11-100

Supports rule

National Endangered Species Act Reform Coalition

FWS-HQ-ES-2018-0007

defenders of wildlife

public

4

FALSE

0

84

1.122449

0

-1.6938776

-1.6938776

702687

73

11-100

More than 100

Opposes rule

Defenders Of Wildlife

FWS-HQ-ES-2018-0007

national endangered species act reform coalition

private

4

FALSE

0

73

4.148649

36

1.9629630

1.9629630

74

160

11-100

11-100

Supports rule

National Endangered Species Act Reform Coalition

FWS-HQ-ES-2018-0097

center for biological diversity

public

7

FALSE

0

39

1.193548

0

-1.3255814

-1.3255814

856518

48

11-100

More than 100

Opposes rule

Center For Biological Diversity

FWS-HQ-ES-2018-0097

farm bureau

private

7

FALSE

0

45

3.943396

17

1.9166667

1.9166667

53

99

11-100

11-100

Supports rule

Farm Bureau

FWS-HQ-NWRS-2012-0086

defenders of wildlife

public

3

FALSE

0

13

4.692308

0

0.6363636

0.6363636

53271

73

11-100

More than 100

Supports rule

Defenders Of Wildlife

FWS-HQ-NWRS-2012-0086

alaska oil and gas association

private

3

FALSE

0

5

1.800000

3

-0.4000000

-0.4000000

5

10

2-10

2-10

Opposes rule

Alaska Oil And Gas Association

FWS-R9-ES-2008-0093

earthjustice

public

6

FALSE

0

97

1.024590

0

-1.7826087

-1.7826087

122

81

11-100

More than 100

Opposes rule

Earthjustice

FWS-R9-ES-2008-0093

national endangered species act reform coalition

private

6

FALSE

0

47

4.433962

21

0.2857143

0.2857143

53

160

11-100

11-100

Supports rule

National Endangered Species Act Reform Coalition

ICEB-2015-0002

nafsa

public

6

FALSE

0

56

4.435185

10

1.1607143

1.1607143

109

151

11-100

More than 100

Supports rule

Nafsa

ICEB-2015-0002

afl-cio

public

6

FALSE

0

5

5.000000

2

1.0000000

1.0000000

5

7

2-10

2-10

Supports rule

Afl-Cio

IRS-2016-0015

americans for tax fairness

public

4

FALSE

0

9

4.888889

0

2.0000000

2.0000000

29853

24

2-10

More than 100

Supports rule

Americans For Tax Fairness

IRS-2016-0015

congressmen

public

4

FALSE

0

1

4.000000

0

-2.0000000

-2.0000000

1

65

1

1

Supports rule

Congressmen

IRS-2016-0015

small businesses

public

4

FALSE

0

1

4.000000

0

2.0000000

2.0000000

1

220

1

1

Supports rule

Small Businesses

IRS-2016-0015

swiss re

private

4

FALSE

0

1

3.000000

0

-1.0000000

-1.0000000

1

232

1

1

Supports rule

Swiss Re

MSHA-2011-0001

wyoming mining association

private

3

FALSE

0

38

2.219512

0

-1.4500000

-1.4500000

41

257

11-100

11-100

Opposes rule

Wyoming Mining Association

MSHA-2011-0001

united mine workers of america

public

3

FALSE

0

4

4.500000

0

1.0000000

1.0000000

4

246

2-10

2-10

Supports rule

United Mine Workers Of America

NOAA-NMFS-2008-0096

environmental community

public

13

FALSE

0

15

4.950000

0

-0.9090909

-0.9090909

20

90

11-100

11-100

Supports rule

Environmental Community

NOAA-NMFS-2008-0096

commercial fishers and processors

private

13

FALSE

0

13

2.692308

6

-0.2857143

-0.2857143

13

58

11-100

11-100

Opposes rule

Commercial Fishers And Processors

NOAA-NMFS-2012-0059

pew

public

6

FALSE

0

31

1.000000

1

-1.6875000

-1.6875000

102875

200

11-100

More than 100

Opposes rule

Pew

NOAA-NMFS-2012-0059

fishing industry

private

6

FALSE

0

12

4.833333

7

-1.1666667

-1.1666667

12

103

11-100

11-100

Supports rule

Fishing Industry

NOAA-NMFS-2012-0059

west coast seafood processors association

private

6

FALSE

0

12

4.833333

7

-1.1666667

-1.1666667

12

252

11-100

11-100

Supports rule

West Coast Seafood Processors Association

NOAA-NMFS-2013-0050

pew

public

8

FALSE

0

8

1.000000

1

-1.3333333

-1.3333333

74818

200

2-10

More than 100

Opposes rule

Pew

NOAA-NMFS-2013-0050

commercial fishing

private

8

FALSE

0

6

3.571429

5

0.8571429

0.8571429

7

59

2-10

2-10

Supports rule

Commercial Fishing

NOAA-NMFS-2013-0050

northeast seafood coalition

private

8

FALSE

0

6

3.571429

5

0.8571429

0.8571429

7

183

2-10

2-10

Supports rule

Northeast Seafood Coalition

NOAA-NMFS-2013-0101

pew charitable trusts

public

5

FALSE

0

60

4.984849

1

-0.5625000

-0.5625000

168293

202

11-100

More than 100

Supports rule

Pew Charitable Trusts

NOAA-NMFS-2013-0101

american sportfishing association

private

5

FALSE

0

5

5.000000

1

0.0000000

0.0000000

1542

22

2-10

More than 100

Supports rule

American Sportfishing Association

NOAA-NMFS-2018-0035

gulf restoration network

public

5

FALSE

0

11

1.000000

0

-1.9000000

-1.9000000

28488

115

11-100

More than 100

Opposes rule

Gulf Restoration Network

NOAA-NMFS-2018-0035

recreational fishing

private

5

FALSE

0

6

1.333333

1

-2.0000000

-2.0000000

6

209

2-10

2-10

Opposes rule

Recreational Fishing

NOAA-NMFS-2018-0035

center for sportfishing policy

private

5

FALSE

0

6

1.333333

1

-2.0000000

-2.0000000

6

50

2-10

2-10

Opposes rule

Center For Sportfishing Policy

NOAA-NMFS-2018-0035-0326

gulf restoration network

public

1

TRUE

0

1

1.000000

0

NaN

NaN

652

115

1

More than 100

Opposes rule

Gulf Restoration Network

NOAA-NOS-2013-0091

national marine sanctuary foundation

public

4

FALSE

0

16

4.263158

1

2.0000000

2.0000000

19

162

11-100

11-100

Supports rule

National Marine Sanctuary Foundation

NOAA-NOS-2013-0091

ocean industries

private

4

FALSE

0

2

2.000000

2

-2.0000000

-2.0000000

2

187

2-10

2-10

Opposes rule

Ocean Industries

NOAA-NOS-2013-0091

american petroleum institute

private

4

FALSE

0

2

2.000000

2

-2.0000000

-2.0000000

2

19

2-10

2-10

Opposes rule

American Petroleum Institute

NPS-2018-0007

aclu

public

4

FALSE

1

57

1.013158

0

1.9672131

1.9672131

76

5

11-100

11-100

Opposes rule

Aclu

NPS-2018-0007

smithsonian

public

4

FALSE

0

3

1.333333

0

2.0000000

2.0000000

3

221

2-10

2-10

Opposes rule

Smithsonian

OCC-2020-0026

aclu

public

3

FALSE

0

74

1.000000

0

-1.9523810

-1.9523810

222

5

11-100

More than 100

Opposes rule

Aclu

OCC-2020-0026

mla

private

3

FALSE

0

12

3.916667

8

2.0000000

2.0000000

12

142

11-100

11-100

Supports rule

Mla

OFCCP-2014-0004

aclu

public

4

FALSE

0

11

4.000000

0

-2.0000000

-2.0000000

7152

5

11-100

More than 100

Supports rule

Aclu

OFCCP-2014-0004

u.s. chamber of commerce

private

4

FALSE

0

13

1.000000

0

1.6923077

1.6923077

13

241

11-100

11-100

Opposes rule

U.s. Chamber Of Commerce

OSHA-H005C-2006-0870

newport news

public

5

FALSE

0

22

4.833333

0

1.0357143

1.0357143

30

176

11-100

11-100

Supports rule

Newport News

OSHA-H005C-2006-0870

southern company

public

5

FALSE

0

15

3.000000

0

0.6666667

0.6666667

15

224

11-100

11-100

Supports rule

Southern Company

PHMSA-2012-0082

sierra club

public

7

FALSE

0

24

5.000000

0

-1.2272727

-1.2272727

330381

219

11-100

More than 100

Supports rule

Sierra Club

PHMSA-2012-0082

american petroleum institute

private

7

FALSE

0

209

1.563380

104

-0.4956522

-0.4956522

214

19

More than 100

More than 100

Opposes rule

American Petroleum Institute

TREAS-DO-2007-0015

other banks

private

20

FALSE

0

13

2.384615

9

0.3846154

0.3846154

13

193

11-100

11-100

Opposes rule

Other Banks

TREAS-DO-2007-0015

greyhound racing industry

private

20

FALSE

0

7

1.000000

7

-0.8000000

-0.8000000

7

114

2-10

2-10

Opposes rule

Greyhound Racing Industry

USCBP-2007-0064

bbp

public

3

FALSE

0

20

1.550000

7

-1.2000000

-1.2000000

23

38

11-100

11-100

Opposes rule

Bbp

USCBP-2007-0064

ebaa

public

3

FALSE

0

5

2.600000

3

-1.2000000

-1.2000000

5

84

2-10

2-10

Opposes rule

Ebaa

USCG-2010-0990

boatus

public

3

FALSE

0

5

2.333333

2

-1.0000000

-1.0000000

6

43

2-10

2-10

Opposes rule

Boatus

USCG-2010-0990

nmma

public

3

FALSE

0

3

4.000000

1

2.0000000

2.0000000

4

180

2-10

2-10

Supports rule

Nmma

USCIS-2010-0017

ncapa

public

3

FALSE

0

2

4.500000

0

2.0000000

2.0000000

2

167

2-10

2-10

Supports rule

Ncapa

USCIS-2010-0017

dpe afl-cio

public

3

FALSE

0

2

1.000000

0

-2.0000000

-2.0000000

2

79

2-10

2-10

Opposes rule

Dpe Afl-Cio

WHD-2011-0001

congresswoman lucille roybal-allard

public

3

FALSE

0

1

4.000000

0

NaN

NaN

1

66

1

1

Supports rule

Congresswoman Lucille Roybal-Allard

WHD-2011-0001

governor terry e. branstad

public

3

FALSE

0

1

1.000000

0

NaN

NaN

1

111

1

1

Opposes rule

Governor Terry E. Branstad

WHD-2019-0001

epi

public

6

FALSE

0

55

1.000000

0

-1.0000000

-1.0000000

60

93

11-100

11-100

Opposes rule

Epi

WHD-2019-0001

wfca

private

6

FALSE

0

54

4.981482

0

1.5000000

1.5000000

54

254

11-100

11-100

Supports rule

Wfca

WHD-2019-0003

epi

public

3

FALSE

0

40

1.000000

0

-1.9756098

-1.9756098

44391

93

11-100

More than 100

Opposes rule

Epi

WHD-2019-0003

shrm

public

3

FALSE

0

23

5.000000

1

0.9600000

0.9600000

25

218

11-100

11-100

Supports rule

Shrm

Histograms of coalition variables

```
d <- coalitions_coded


ggplot(d, aes(x = coalition_success)) +
  geom_histogram() +
  labs(x = "Coalition Success")
```

```
ggplot(d, aes(x = coalition_size)) +
  geom_histogram() +
  labs(x = "Coalition size")
```

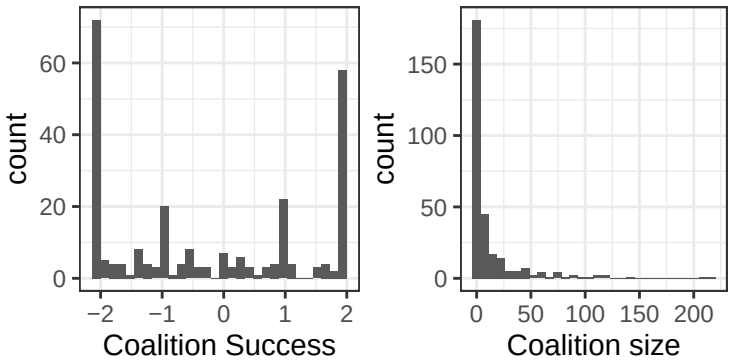


Figure 2: Hand-coded Data by Coalition

Number of comments

```
#TODO
#ggplot(d, aes( x= comment_length)) + geom_histogram()+ labs(x = "% (Comment length/pr
ggplot(d, aes( x= log(comments))) +
  geom_histogram() +
  labs(x = "Log(comments)")
```

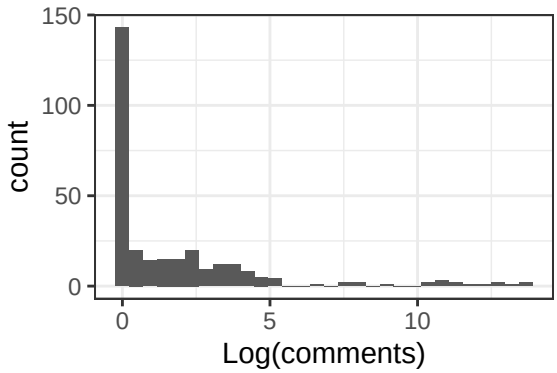


Figure 3: Number of Comments Linked to Hand-Coded Coalitions

Number of comments from members of Congress

(just from the hand-coded sample; I have more from the full sample to merge in.)

```
#TODO

#ggplot(d, aes( x= comment_length)) + geom_histogram()+ labs(x = "% (Comment length/pr

ggplot(d, aes( x= coalition_congress)) +

  geom_histogram() +

  labs(x = "Comments from Members of Congress")
```

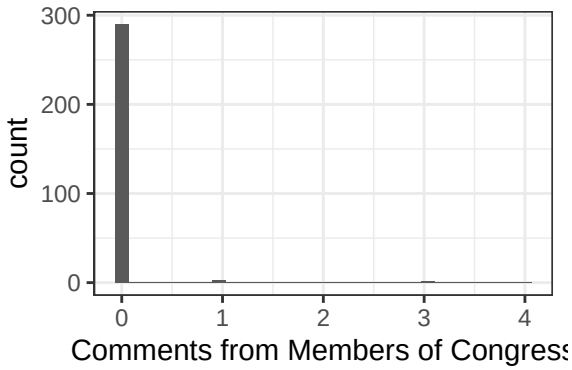


Figure 4: Number of Comments from Members of Congress Linked to Hand-Coded Coalitions

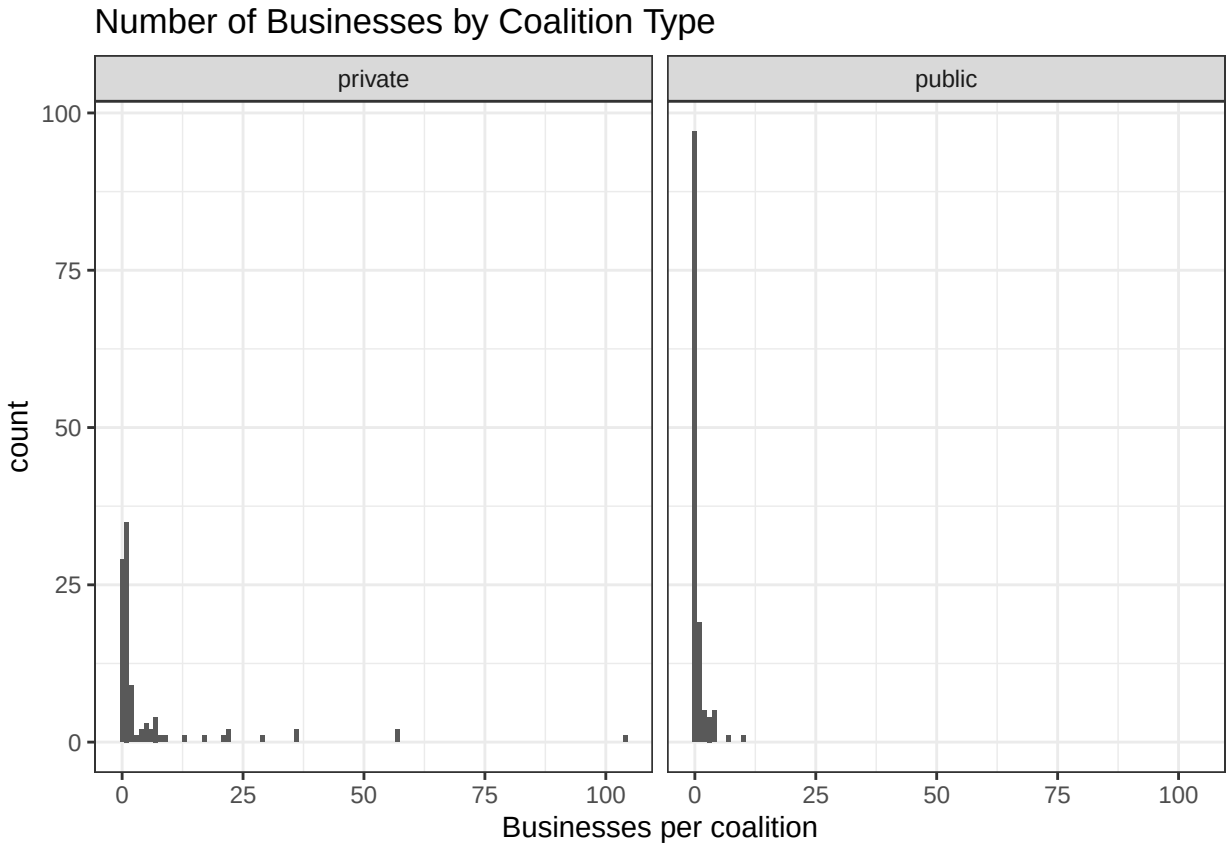
---

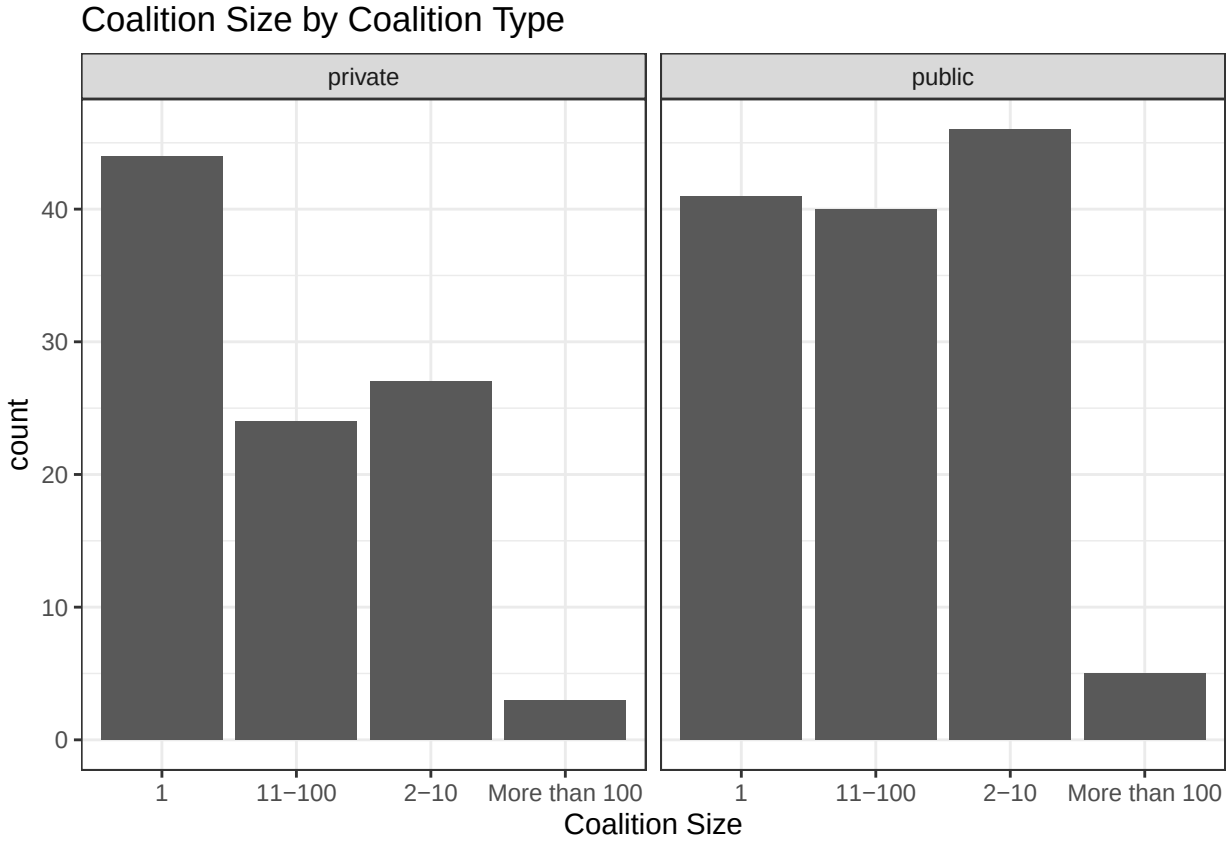
Coalitions by type (public interest vs. private interest)

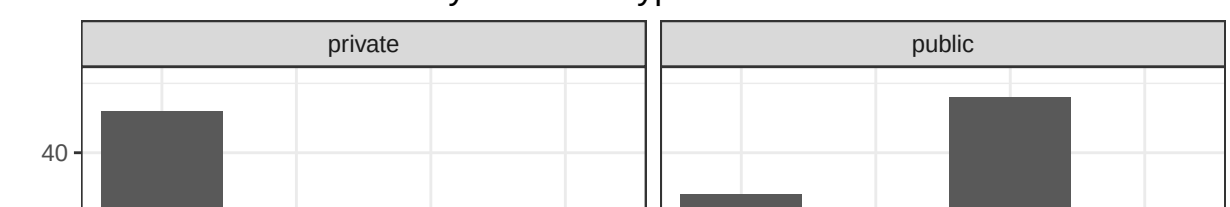
```
ggplot(d %>% drop_na(coalition_type)) +


    aes(x = as.numeric(coalition_business)) +

  geom_histogram(stat = "count") +

  labs(x = "Businesses per coalition",

       title = "Number of Businesses by Coalition Type") +

  facet_wrap("coalition_type")#, scales = "free_x")


ggplot(coalitions_coded %>% filter(!is.na(coalition_type)), aes(x = Coalition_size)) +

  geom_histogram(stat = "count")+
```

```
  labs(x = "Coalition Size",
       title = "Coalition Size by Coalition Type") +
  facet_wrap("coalition_type", scales = "free_x")


ggplot(coalitions_coded %>% filter(!is.na(coalition_type)), aes(x = Comments)) +
  geom_histogram(stat = "count")+
  labs(x = "Total Number of Comments",
       title = "Number of Comments by Coalition Type") +
  facet_wrap("coalition_type", scales = "free_x")
```

```
coalitions_coded %>%
  drop_na(coalition_type, Coalition_Position) %>%
  distinct(coalition_comment, coalition_type, coalition_size, coalition_success, comment
  ungroup() %>%
  ggplot() +
  aes(y = coalition_success, x = log(comments), color = coalition_type) +
  geom_jitter(aes(size = coalition_size), alpha = .5) +
  geom_smooth(se = FALSE, method = "lm")+
  facet_grid(Coalition_Position ~ .)


coalitions_coded %>%
  drop_na(coalition_type, Coalition_Position) %>%
  distinct(coalition_comment, coalition_type, coalition_size, coalition_success, comment
  mutate(comments = comments) %>%
  ungroup() %>%
  ggplot() +
```


Number of Businesses by Coalition Type
private
public
count
Businesses per coalition


Coalition Size by Coalition Type
private
public
count
1
11−100
2−10
More than 100
Coalition Size


Number of Comments by Coalition Type
private
public

```
  aes(y = coalition_success, x = log(comments), color = coalition_type) +
  geom_jitter(aes(size = coalition_size), alpha = .5) +
  geom_smooth(se = FALSE, method = "lm") +
  #facet_wrap("president")  +
  facet_grid(Coalition_Position ~ president)
```

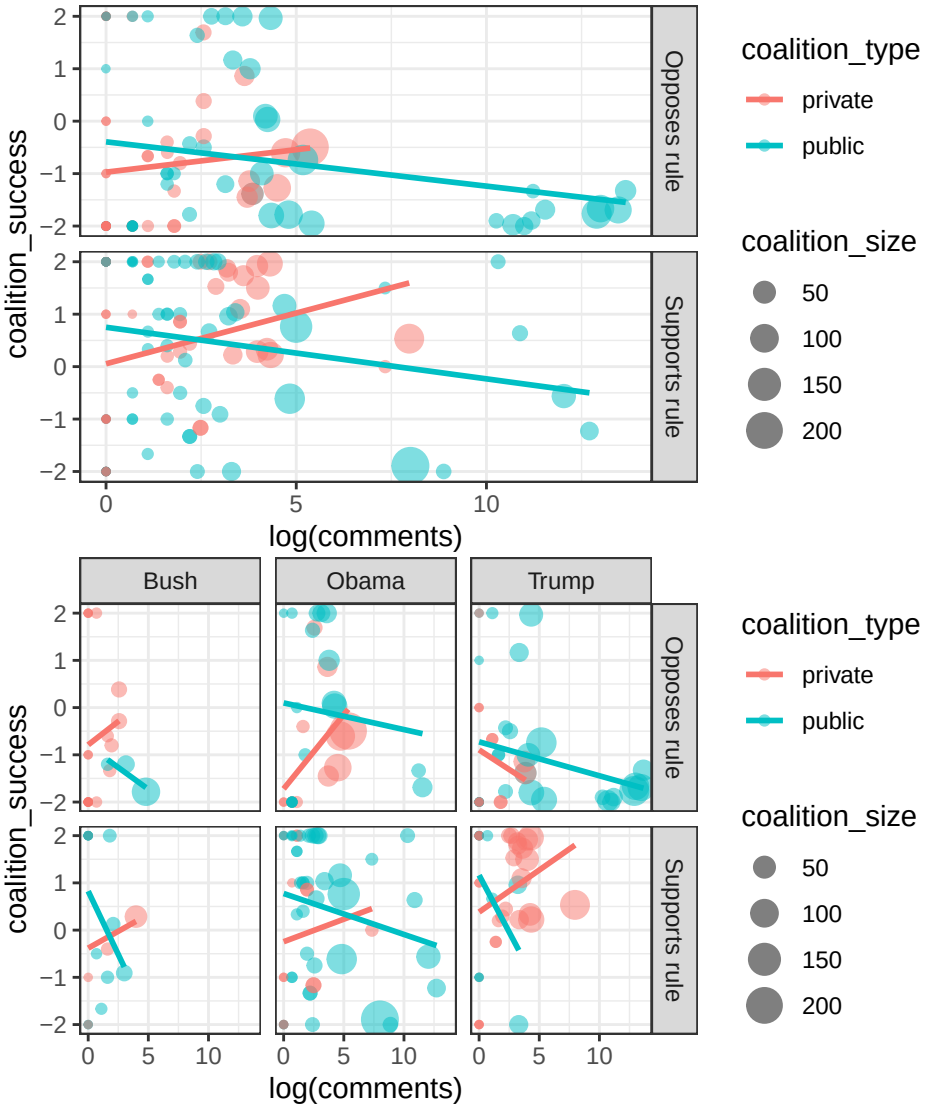


Figure 6: Lobbying Success by Number of Supportive Comments

1.2.2.1 Number of supportive comments

1.2.2.2 Coalition Size (number of supportive organizations)

```
coalitions_coded %>%
  drop_na(coalition_type, Coalition_Position) %>%
  distinct(coalition_comment, coalition_type, coalition_size, coalition_success, comment
  ungroup() %>%
  ggplot() +
  aes(y = coalition_success, x = coalition_size, color = coalition_type) +
  geom_jitter(aes(size = comments ), alpha = .5) +
  geom_smooth(se = FALSE, method = "lm") +
  facet_grid(Coalition_Position ~ .)+
  scale_size_continuous(labels = comma)


coalitions_coded %>%
  drop_na(coalition_type, Coalition_Position) %>%
  distinct(coalition_comment, coalition_type, coalition_size, coalition_success, comment
  ungroup() %>%
  ggplot() +
  aes(y = coalition_success, x = coalition_size, color = coalition_type) +
  geom_jitter(aes(size = comments ), alpha = .5) +
  geom_smooth(se = FALSE, method = "lm") +
  #facet_wrap("president") +
  facet_grid(Coalition_Position ~ president)+
  scale_size_continuous(labels = comma)
```

1.2.2.3 The correlation between coalition size and the total number of comments

The total number of form-letter comments is highly correlated with the number of organizations in a coalition.

The total number of comments excludes organization comments.

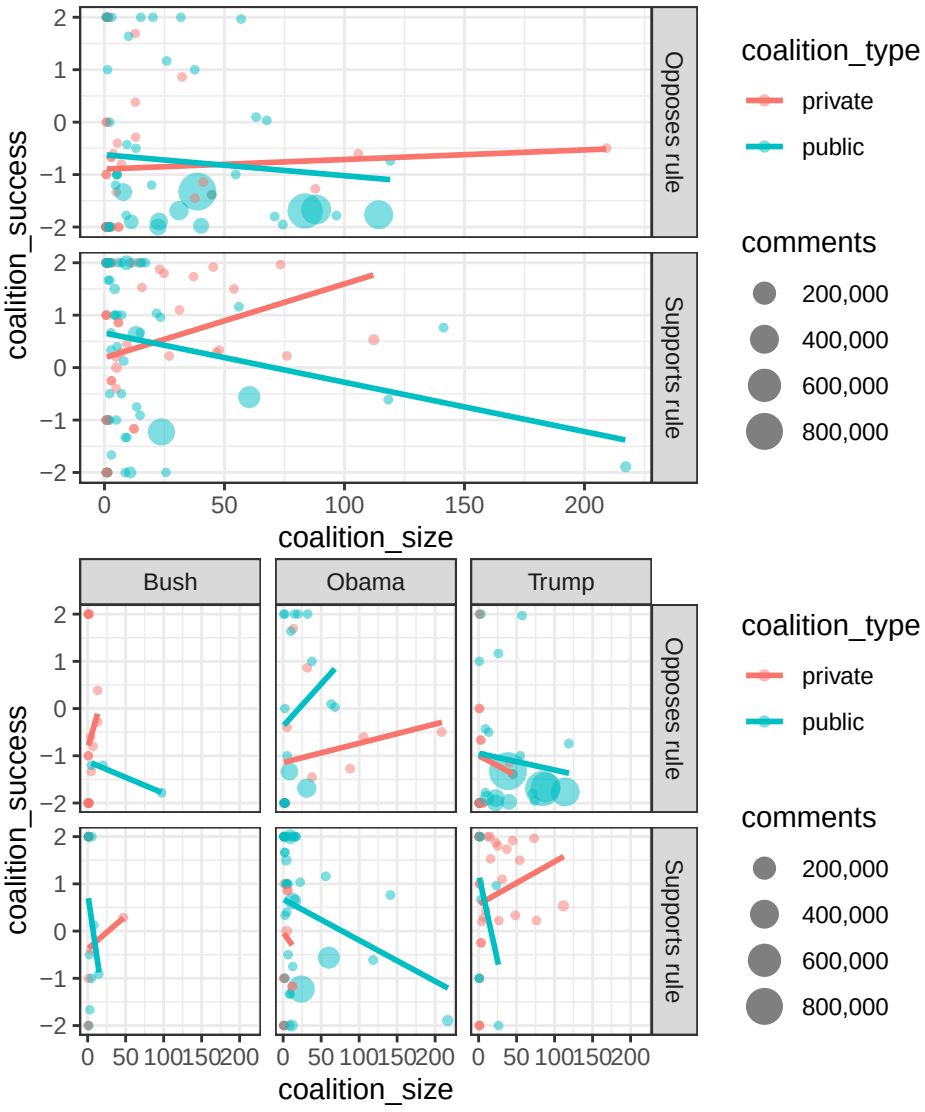


Figure 7: Lobbying Success by Number of Supportive Comments

```
coalitions_coded %>%
  mutate(comments = comments - coalition_size) %>%
  ggplot() +
  aes(x = coalition_size, y = comments) +
  geom_point() +
  geom_smooth(method = "lm")


coalitions_coded %>%
  mutate(comments = comments - coalition_size) %>%
  ggplot() +
  aes(x = log(coalition_size), y = log(comments)) +
  geom_point() +
  geom_smooth(method = "lm")
```

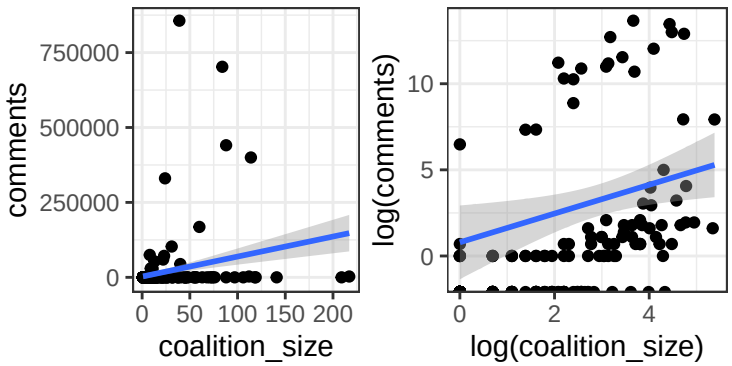


Figure 8

1.3 Comments from legislators

One mechanism by which campaigns may influence policy is by mobilizing members of Congress. Thus, I identify comments submitted by members of Congress and count the number of legislators in each lobbying coalition.

```r
load(here::here("data", "comments_congress.Rdata"))


comments_congress$Year %<>% as.numeric()


breaks <- seq(2000, 2020,by = 2)


comments_congress %>%
  as_tibble() %>%
  filter(Year %>% as.numeric() > 2000,
         Year %>% as.numeric() < 2021) %>%
  add_count(agency, name = "agency_n") %>%
  filter(agency_n > 88) %>%
  count(Year, Chamber, agency, sort = TRUE) %>%
  ggplot() +
  aes(x = Year, y = n, fill = Chamber) +
  geom_col(position = "stack") +
  facet_wrap("agency", scales = "free") +
  labs(x = "" ,
       y = "Number of Rulemaking Comments from Members of Congress") +
  scale_x_continuous(breaks = breaks) +
  theme(axis.text.x = element_text(angle = 90),
        axis.ticks.x = element_blank(),
        panel.grid.major.x = element_blank())


# table
# elected comments by type
comments_coded %>%
  filter(comment_type == "elected") %>%
```

```
  mutate(org_type = str_remove(org_type, "-.*|;.*| .*")) %>%
  count(org_type,  sort =T) %>%
  rename(elected_type = org_type) %>%
  kablebox()
```

elected_type

n

house

33

senate

18

congress

5

gov

5

florida

4

governor

4

maryland

4

mayor

4

mississippi

4

representative

4

NA

4

alaska

3

illinois

3

senator

3

senators

3

state

3

texas

3

california

2

city

2

oklahoma

2

attorney

1

baltimore

1

berkeley

1

carbondale

1

carver

1

elected

1

georgia

1

iowa

1

jersey

1

kentucky

1

linda

1

ma

1

member

1

missouri

1

mt

1

nebraska

1

new

1

north

1

ohio

1

pennsylvania

1

representatives

1

rosemead

1

santa

1

south

1

tennessee

1

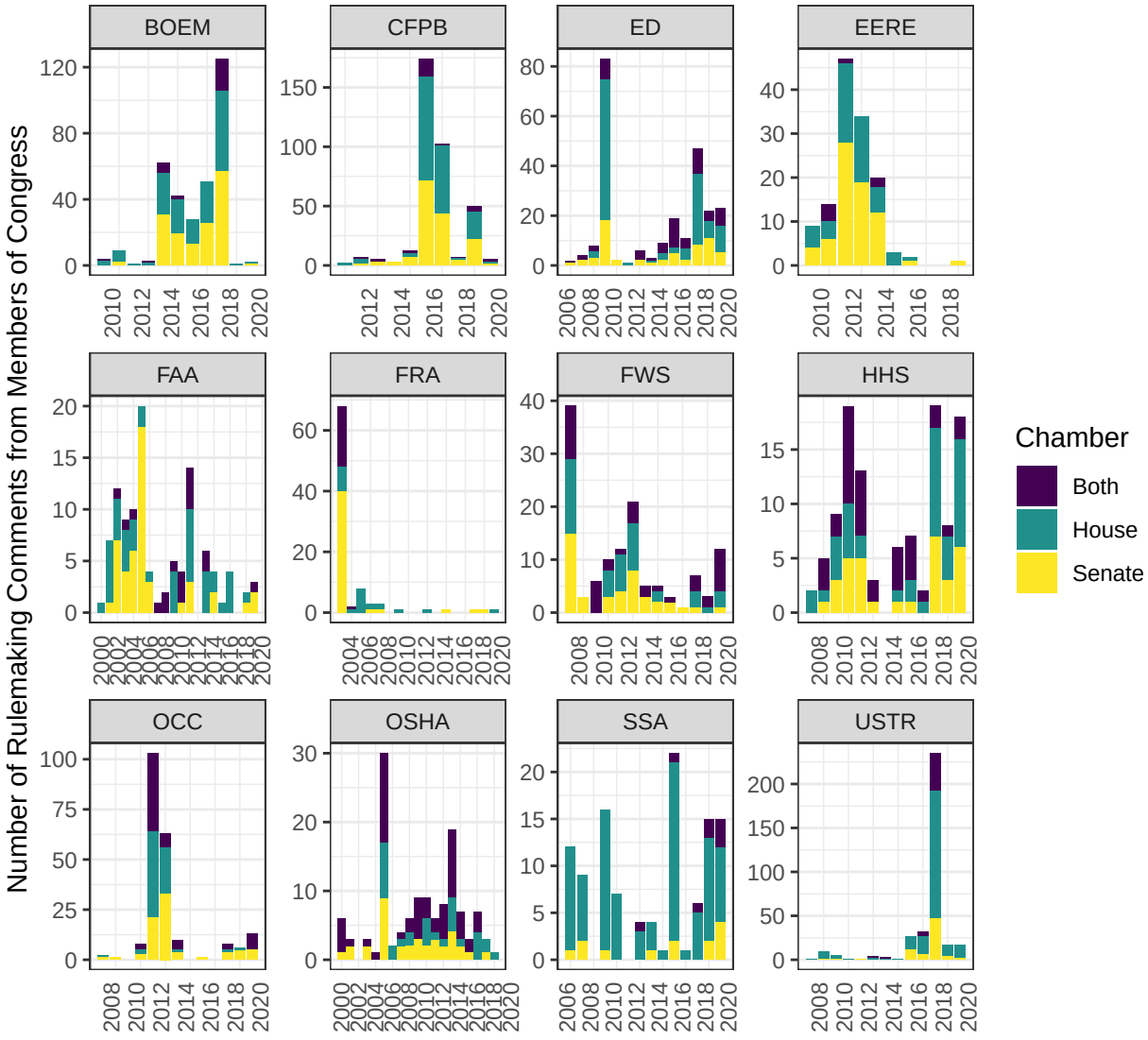


Figure 9: Number of Rulemaking Comments from Members of Congress per Year, 2005-2020

Challenges for inference

Non-independence

Organzations lobbying in coalitions The hand-coded sample includes 4923 hand-coded documents representing 3.387147×10^6 comments. However, many of these comments belong coalitions and are thus not independent. When Friends of Earth and the Sierra Club lobbying together on a rule, the success of each depends on the other. Thus, I group comments into coalitions. The hand-coded sample includes 297 "coalitions," 149 of which are single organizations (not really coalitions), leaving 148 true coalitions of groups lobbing together.

Multiple coalitions lobbying on the same rule The fact that several coalitions may lobby on the same rule creates a less problematic form of dependence among observations. One coalition's lobbying success is correlated with another coalition's lobbying success to the extent that they are asking for the same or contradicting things. Because we have grouped organizations into coalitions, the causally-related asks (those organizations lobbying *because* another organization is) are largely accounted for.

---

2 Descriptives

The hypotheses set out in Chapter 2 are largely descriptive.

Hypothesis 2.1. Most people engage in national policy processes as a result of organized public pressure campaigns.

> Yes, large majorities of both the hand-coded sample of comments and full dataset are form letters.

The hand-coded sample generally excludes individuals who are not clearly associated with a mass comment campaign. However, these excluded comments are a minority of the

5095101 comments on the hand-coded rules. Even without looking at the excluded comments (many of which may also be part of pressure campaigns), most commenters are part of organized campaigns.

```
comments_coded %>%
  # split out mass comments submitted with org comments
  mutate(comment_type = ifelse(comment_type == "org" & comments > 99,
         "org;mass",
         comment_type) %>%
  str_split(";")) %>%
  unnest(comment_type) %>%
  mutate(comments = ifelse(comment_type == "org",
                           1,
                           comments)) %>%
  group_by(comment_type) %>%
  tally(comments) %>%
  kablebox()
```

comment_type

n

elected

138

individual

556

mass

3383085

org

3238

NA

0

Comments that I have thus far attributed to mass comment campaigns are also a majority of the full data. In addition, many of the comments that I have yet to classify are also part of mass comment campaigns.

```
# massive undercount of mass
#TODO include new, further collapsed data
comments_min %>%
  mutate(mass = number_of_comments_received > 99) %>%
  group_by(mass) %>%
  tally(number_of_comments_received)%>%
  kablebox()
```

mass

n

FALSE

13639400

TRUE

69515059

Hypothesis 2.2. Public pressure campaigns are organized by *coalitions* that include groups that engage in sophisticated technical lobbying.

Nearly all mass comments in the hand-coded rules were mobilized by a group

that also engaged in sophisticated lobbying.

Organizations (if any) affilitated with different types of comments in the hand-coded data:

```
comments_coded %>%
  group_by(docket_id, coalition, coalition_comments, coalition_type) %>%
  mutate(comment_type = comment_type %>% as.factor()) %>%
  count(comment_type) %>%
  ungroup() %>%
  drop_na(comment_type) %>%
  filter(!comment_type %in% c("NA", "coalition", "mass")) %>%
  pivot_wider(names_from =  comment_type, values_from = n) %>%
  arrange(-coalition_comments) %>%
  kablebox()
```

docket_id

coalition

coalition_comments

coalition_type

org

elected

individual

FWS-HQ-ES-2018-0097

Center For Biological Diversity

856518

public

44

NA

8

FWS-HQ-ES-2018-0007

Defenders Of Wildlife

702687

public

73

NA

1

FWS-HQ-ES-2018-0006

Defenders Of Wildlife

440844

public

78

NA

1

CEQ-2019-0003

Partnership Project

400089

public

100

2

8

PHMSA-2012-0082

Sierra Club

330381

public

22

NA

NA

NOAA-NMFS-2013-0101

Pew Charitable Trusts

168293

public

18

NA

NA

NOAA-NMFS-2012-0059

Pew

102875

public

16

NA

NA

NOAA-NMFS-2013-0050

Pew

74818

public

9

NA

NA

BSEE-2018-0002

Earthjustice

71627

public

16

3

1

BSEE-2017-0008

Center For Biological Diversity

59410

public

17

2

2

FWS-HQ-NWRS-2012-0086

Defenders Of Wildlife

53271

public

11

NA

NA

WHD-2019-0003

Epi

44391

public

36

5

NA

IRS-2016-0015

Americans For Tax Fairness

29853

public

1

NA

NA

NOAA-NMFS-2018-0035

Gulf Restoration Network

28488

public

10

NA

NA

OFCCP-2014-0004

Aclu

7152

public

8

NA

NA

PHMSA-2012-0082

NA

3084

NA

3

NA

NA

FEMA-2016-0003

Pew

2982

public

37

NA

185

CEQ-2019-0003

Liuna

2892

private

116

1

NA

NOAA-NMFS-2013-0101

American Sportfishing Association

1542

private

4

NA

NA

BSEE-2012-0005

Pew

1530

public

2

1

NA

OCC-2020-0026

Aclu

222

public

70

7

NA

PHMSA-2012-0082

American Petroleum Institute

214

private

112

5

NA

ICEB-2015-0002

NA

183

NA

NA

NA

182

CFPB-2019-0022

Naacp

177

public

87

4

2

CFPB-2016-0025

Wcbc

148

public

118

7

7

PHMSA-2012-0082

Barrington And Illinois Trac Coalition

125

public

115

9

1

FWS-R9-ES-2008-0093

Earthjustice

122

public

95

6

20

CFPB-2016-0025

Axcess Financial

112

private

68

4

11

ICEB-2015-0002

Nafsa

109

public

54

1

2

BSEE-2013-0011

Shell

90

private

28

4

NA

CFPB-2019-0006

Naca

77

public

57

8

1

FWS-HQ-ES-2018-0006

National Endangered Species Act Reform Coalition

76

private

75

1

NA

NPS-2018-0007

Aclu

76

public

53

1

7

FWS-HQ-ES-2018-0007

National Endangered Species Act Reform Coalition

74

private

73

NA

NA

CFPB-2016-0025

Naacp

70

public

31

22

2

CFPB-2019-0022

Aca International

69

private

66

NA

NA

CFPB-2016-0025

Ncua

66

public

65

NA

NA

WHD-2019-0001

Epi

60

public

52

8

NA

WHD-2019-0001

Wfca

54

private

54

NA

NA

FWS-HQ-ES-2018-0097

Farm Bureau

53

private

47

1

2

FWS-R9-ES-2008-0093

National Endangered Species Act Reform Coalition

53

private

52

NA

1

CFPB-2019-0006

True

47

private

2

NA

NA

CFPB-2019-0006

True

47

public

41

NA

1

CFPB-2019-0006

True

47

NA

1

NA

NA

FEMA-2016-0003

Nema

44

public

44

NA

NA

CEQ-2019-0003

Association Of American Indian Affairs

43

private

43

NA

NA

MSHA-2011-0001

Wyoming Mining Association

41

private

41

NA

NA

BSEE-2012-0005

Offshore Operators Committee

38

private

23

NA

NA

FWS-HQ-ES-2018-0097

Congressional Sportsmen's Foundation

37

private

31

1

2

FEMA-2016-0003

Nreca

36

public

33

3

NA

CFPB-2019-0022

Nafcu

34

private

34

NA

NA

DOT-OST-2018-0068

NA

31

NA

31

NA

NA

OSHA-H005C-2006-0870

Newport News

30

public

26

2

NA

BSEE-2018-0002

American Petroleum Institute

28

private

17

NA

NA

CFPB-2019-0006

NA

28

NA

24

1

1

CFPB-2019-0022

American Bar Association

28

public

27

1

NA

WHD-2019-0001

Ppwo

27

public

24

2

NA

FWS-HQ-ES-2018-0097

Hunters

25

private

20

1

1

WHD-2019-0003

Shrm

25

public

24

1

NA

WHD-2019-0003

Acg

24

private

23

1

NA

FEMA-2016-0003

Iaem-Usa

23

public

23

NA

NA

USCBP-2007-0064

Bbp

23

public

18

2

3

ED-2016-OESE-0032

Public Schools

22

public

2

NA

NA

CFPB-2016-0025

NA

21

NA

14

NA

5

ED-2016-OESE-0032

Department Of Education

20

public

2

NA

NA

NOAA-NMFS-2008-0096

Environmental Community

20

public

11

NA

NA

NOAA-NOS-2013-0091

National Marine Sanctuary Foundation

19

public

15

1

3

CFPB-2019-0006

Thrifty Loans

18

private

11

6

NA

DOT-OST-2011-0044

Cma

17

public

17

NA

NA

DOT-OST-2011-0044

NA

17

NA

NA

NA

17

ED-2016-OESE-0032

NA

16

NA

14

1

NA

FEMA-2016-0003

Aasa

16

public

16

NA

NA

OSHA-H005C-2006-0870

Southern Company

15

public

15

NA

NA

WHD-2019-0001

Ncpa

15

private

15

NA

NA

DOI-2015-0005

Blanket Crew

14

public

12

1

1

USCIS-2010-0017

NA

14

NA

1

NA

13

BSEE-2013-0011

Pew

13

public

12

NA

1

FWS-HQ-ES-2018-0006

National Congress Of American Indians

13

public

13

NA

NA

NOAA-NMFS-2008-0096

Commercial Fishers And Processors

13

private

9

NA

NA

NPS-2018-0007

NA

13

NA

NA

NA

13

OFCCP-2014-0004

U.s. Chamber Of Commerce

13

private

13

NA

NA

TREAS-DO-2007-0015

Other Banks

13

private

13

NA

NA

FEMA-2016-0003

NA

12

NA

NA

NA

12

NOAA-NMFS-2012-0059

Fishing Industry

12

private

12

NA

NA

NOAA-NMFS-2012-0059

West Coast Seafood Processors Association

12

private

12

NA

NA

OCC-2020-0026

Mla

12

private

12

NA

NA

WHD-2019-0001

Ancor

12

private

12

NA

NA

DOI-2015-0005

Support And Assist

11

public

10

NA

NA

FEMA-2016-0003

Nrdc

11

public

11

NA

NA

FEMA-2016-0003

Usrc

11

public

11

NA

NA

ED-2016-OESE-0032

National Education Association

10

public

2

NA

NA

CFPB-2019-0006

Nafcu

9

private

9

NA

NA

DEA-2018-0005

Hsca

9

public

9

NA

NA

FWS-HQ-ES-2018-0007

National Congress Of American Indians

9

public

9

NA

NA

NOAA-NMFS-2012-0059

New England Fishery Management Council

9

public

9

NA

NA

NOAA-NMFS-2012-0059

Regional Councils

9

public

9

NA

NA

USCBP-2007-0064

NA

9

NA

9

NA

NA

DOI-2015-0005

Big Autonomy

8

public

7

NA

1

NOAA-NMFS-2008-0096

Regional Fishery Management Councils

8

public

7

1

NA

BSEE-2017-0008

American Petroleum Institute

7

private

7

NA

NA

Hypothesis 2.3. Public interest group coalitions mobilize *more often* than private interest group (e.g., business-led) coalitions.

> Yes, public interest coalitions use public pressure campaigns more often, both in the absolute number of campaigns and the share of lobbying efforts that involve a pressure campaign.

```
coalitions_coded %>%
  mutate(mass_comment_campaign = coalition_comments > 99) %>%
  count(coalition_type, mass_comment_campaign) %>%
  drop_na(coalition_type) %>%
  kablebox()
```

coalition_type

mass_comment_campaign

n

private

FALSE

94

private

TRUE

4

public

FALSE

108

public

TRUE

24

Hypothesis 2.4. Public interest group coalitions mobilize *more successfully* than private interest group (e.g., business-led) coalitions.

Yes, by far.

```
coalitions_coded %>% group_by(coalition_type) %>%
  summarise(total_comments = sum(coalition_comments),
            average_comments = mean(comments)) %>% drop_na(coalition_type) %>% kablebox(
```

coalition_type

total_comments

average_comments

private

5822

59.40816

public

3377839

25589.68939

Hypothesis 2.5. Public pressure campaigns targeting national policy are most often run by large national policy advocacy organizations.

Yes.

Hypothesis 2.6. If narrow private interest groups (e.g., businesses) launch public pressure campaigns, it is a response to an opposing campaign.

TBD: In these data (high salience rules), almost all coalitions are opposed.

```
coalitions_coded %>%
  count(coalition_type, coalition_unopposed) %>% drop_na(coalition_type)
```

```
## # A tibble: 4 x 3
##   coalition_type coalition_unopposed     n
##   <chr>          <lgl>               <int>
## 1 private        FALSE                  97
## 2 private        TRUE                    1
## 3 public         FALSE                 131
## 4 public         TRUE                    1
```

3 Models of lobbying success

3.1 DV = Comments from members of Congress

Hypothesis 3.1. The scale of public engagement moderates elected officials' engagement in agency rulemaking engagement.

> Preliminary finding: The size of the lobbying coalition (the number of organizations) is positively correlated with the number of members of Congress who engage. When we account for variation in coalition size, there is no evidence that the total number of comments is related to the number of comments from members of Congress.

The simplest model of the relationship between congressional attention and public attention is a model estimating the count of legislator letters as a function of features of the rulemaking, including the total number of public comments. The number of letters from members of congress would be a count process; this would be a Poisson or negative binomial regression.

In equation (3.1), y_j is a count of the number of legislator comments on a proposed rule j, β_1 is the effect of a one-unit increase in the logged number of public comments on proposed rule j, and η is a vector of coefficients on other factors (X_j) that may lead legislators to comment.

$$y_j = \beta_0 + \beta_1 \log(\text{Public comments})_j + \eta X_j + \epsilon_j$$

Alternatively, if we want to control for legislator characteristics that may make them more or less likely to comment on a rule, we can make members of Congress the unit of analysis.

The dependent variable is now whether or not a given legislator i commented on the proposed rule j. The relationship between public engagement and legislator engagement can be modeled by Equation (3.1), where $Pr(Comment_{ij})$ is the probability that legislator i comments on a proposed rule j, β_1 is the effect of a one-unit increase in the logged number of public comments on proposed rule j, and η is a vector of coefficients on other factors (X_{ij}) that may affect whether a legislator engages.

$$logit(Pr(\text{Legislator comment}_{ij})) = \beta_0 + \beta_1 \log(\text{Public comments})_{ij} + \eta X_{ij} + \epsilon_{ij}$$

Hypothesis 3.2. Public pressure campaigns attract oversight from allies. The more comments supporting a position, the more likely principals holding that position are to engage.

Hypothesis 3.3. Public pressure campaigns reduce oversight from opponents. The more comments opposing a position, the less likely principals holding that position are to engage.

The simplest model of the relationship between congressional attention and public support or opposition to a proposed rule would be to model the net count of legislator letters supporting and opposing the proposed as a function of features of the rulemaking, including the net number of public comments supporting and opposing. As the number of letters from members of congress would be a count process, this would be Poisson or negative binomial regression.

The model is the same as equation (3.1) except that y_j is now the *net* number of legislator comments supporting a proposed rule j, and β_1 is now the effect of a one-unit increase in the logged *net* number of public comments supporting proposed rule j.

With a measure of the likely position on each rule (for example, if promulgated by a copartisan administration), the individual legislator can be the unit of analysis. The proba-

bility that legislator i will comment on rule j, given their position p_{ij} on a proposed rule j ($Pr(Comment_{ij}i|p_{ij})$), is modeled in equation (3.1). Hypothesis 3.2 implies that β_1 is positive and Hypothesis 3.3 implies that β_2 is negative.

$$logit(Pr(\text{Legislator Comment}_{ij}|p_{ij})) = \beta_0 + \beta_1 \text{Comments supporting } p_{ij} + \beta_2 \text{Comments opposing } p_{ij} + \eta X_{ij} +$$

3.2 Results: Lobbying success

I assess the relationship between lobbying success and mass comments by modeling coalition i's lobbying success in a rulemaking j, y_{ij} as a combination of whether the coalition is unopposed, the coalition's size, whether it is a business coalition, and the logged number of mass comments. I estimate these relationships using OLS regression.

$$Y_{ij} = \boldsymbol{\beta_1 \textbf{log(Comments)}}_{ij} + \beta_2 \text{Size}_{ij} + \beta_3 \text{Unopposed}_{ij} + \beta_3 \text{Coalition Type}_{ij} + \epsilon_{ij}$$

I use two related measures of coalition type. Models 1 and 3 use my classification of coalitions as primarily public or private interests. Models 2 and 4 below use a related measure: the share of coalition members that are businesses or trade associations. Models 3 and 4 include interacting each measure of the coalition's type with a dummy for president Trump rather than President Obama's administration. Bush-era rules are dropped from these models for simplicity.

3.2.1 Coalition Success as the Dependent Variable

Note: these models include coalitions of 1 (organizations lobbying alone), but results are similar if I exclude them, except that coalition size has a much weaker correlation with success.

NOTE: At this time, the sample mostly rules that received an unusual number

of comments, so these results are based on variation with high-salience rulemakings.

TODO: Add specification with agency fixed effects?

```
m_business <- lm(coalition_success ~
          log(comments) +
          #comment_length +
          coalition_business +
          log(coalition_size) +
          coalition_unopposed,
        data = coalitions_coded)


m <- lm(coalition_success ~
          log(comments) +
          #comment_length +
          coalition_type +
          log(coalition_size) +
          coalition_unopposed,
        data = coalitions_coded)


m_business_president <- lm(coalition_success ~
          log(comments) +
          #comment_length +
          coalition_business*president +
          log(coalition_size) +
          coalition_unopposed,
        data = coalitions_coded %>% filter(president != "Bush"))
```

```
m_president <- lm(coalition_success ~
          log(comments) +
          #comment_length +
          coalition_type*president +
          log(coalition_size) +
          coalition_unopposed,
        data = coalitions_coded %>% filter(president != "Bush"))


models <- list(m,
               m_business,
               m_president,
               m_business_president)


modelsummary(models, stars = TRUE)
```

	Model 1	Model 2	Model 3	Model 4
(Intercept)	-0.256	-0.269**	-0.535*	0.071
	(0.191)	(0.130)	(0.323)	(0.194)
log(comments)	-0.156***	-0.140***	-0.146***	-0.148***
	(0.053)	(0.054)	(0.052)	(0.053)
coalition_typepublic	0.302		0.893**	
	(0.224)		(0.360)	
log(coalition_size)	0.222**	0.265**	0.223**	0.261**
	(0.102)	(0.108)	(0.105)	(0.112)
coalition_unopposedTRUE	-1.744	-1.731	-1.465	-2.071
	(1.564)	(1.586)	(1.532)	(1.561)
coalition_business		-0.003		-0.016
		(0.012)		(0.013)
presidentTrump			0.619	-0.504**
			(0.378)	(0.221)
coalition_typepublic × presidentTrump			-1.476***	
			(0.488)	
coalition_business × presidentTrump				0.042*
				(0.023)
Num.Obs.	208	260	167	215
R2	0.051	0.034	0.120	0.076
R2 Adj.	0.032	0.019	0.087	0.050
AIC	780.1	982.9	617.6	807.2
BIC	800.1	1004.3	642.6	834.2
Log.Lik.	-384.056	-485.472	-300.805	-395.593
F	2.700	2.260	3.632	2.866

* $p < 0.1$, ** $p < 0.05$, *** $p < 0.01$

My preferred model is model 3:

```
# model-success-plot
m_president %>%
  tidy(conf.int = TRUE) %>%
  filter(term != "(Intercept)") %>%
  ggplot() +
  geom_hline(yintercept = 0, color = "grey") +
  aes(x = term,
      y = estimate,
      ymin = conf.low,
      ymax = conf.high) +
  geom_pointrange( )  +
  coord_flip() +
  labs(y = "Lobbying Success",
       x = "")
```

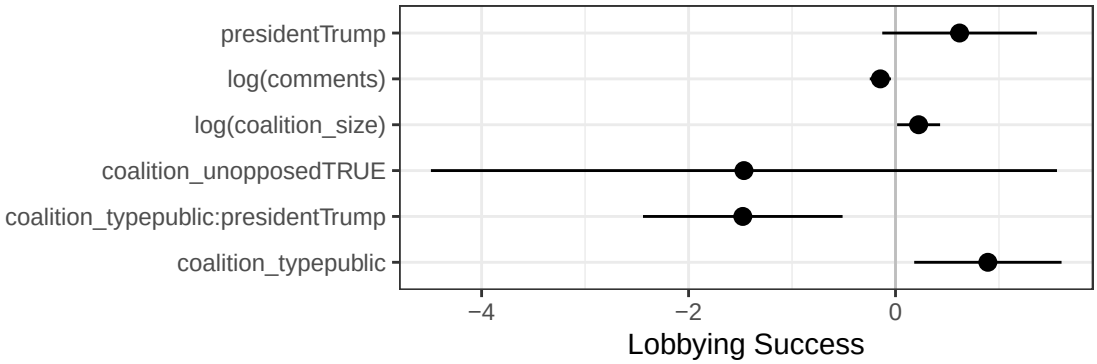


Figure 10: OLS Model of Coalition Lobbying Sucess with Hand-coded Data

3.2.1.1 Modeling Congressional Support as a Mediator of Lobbying Success

To assess congressional support as a mediator in the influence of public pressure campaigns on rulemaking, I estimate the average conditional marginal effect (ACME, conditional on the number of comments from Members of Congress) and average direct effect

(ADE) of mass comments using mediation analysis. Model 3 in table 1 replaces the dependent variable (lobbying success) with the mediator variable (the number of supportive members of Congress). Model 1 is the same as Model 1 above. Model 2 is the same but includes the proposed mediator, the number of supportive comments from members of Congress.

```
#TODO add headers, cut out demands, add political information box, shift principal com
#TODO add outcome model
knitr::include_graphics(here::here("figs", "causal-oversight-1.png"))
```

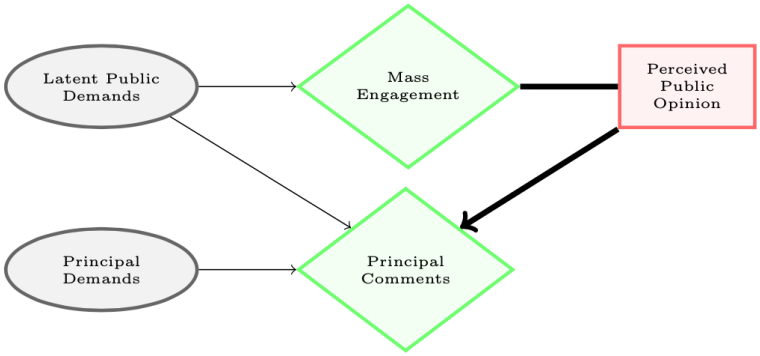


Figure 11: The Mediator Model: The Relationship Between Public Pressure and Congressional Oversight

---

3.2.1.1.1 Mediator model (3.2.1.1.1):

$$\text{Congressional support}_{ij} = \beta_0 + \beta_1 log(\text{Comments}_{ij}) + \beta_{2-n} X_{ij} + \epsilon_{ij}$$

```
# poisson correct model
m_congress <- glm(coalition_congress ~  log(comments) + #comment_length +
                  coalition_type +  log(coalition_size) + coalition_unopposed,
                family = "poisson",
                data = coalitions_coded %>% filter(!is.na(coalition_success)))
```

```
summary(m_congress)
```

```
##
## Call:
## glm(formula = coalition_congress ~ log(comments) + coalition_type +
##     log(coalition_size) + coalition_unopposed, family = "poisson",
##     data = coalitions_coded %>% filter(!is.na(coalition_success)))
##
## Deviance Residuals:
##     Min       1Q   Median       3Q      Max
## -1.5228  -0.3207  -0.1368  -0.0764   4.6550
##
## Coefficients:
##                           Estimate Std. Error z value Pr(>|z|)
## (Intercept)               -6.6229     1.1128  -5.952 2.65e-09 ***
## log(comments)             -0.2302     0.1516  -1.518   0.1290
## coalition_typepublic       1.1648     0.6522   1.786   0.0741 .
## log(coalition_size)        1.3653     0.3018   4.524 6.06e-06 ***
## coalition_unopposedTRUE   -9.6796  2103.3628  -0.005   0.9963
## ---
## Signif. codes:  0 '***' 0.001 '**' 0.01 '*' 0.05 '.' 0.1 ' ' 1
##
## (Dispersion parameter for poisson family taken to be 1)
##
##     Null deviance: 105.931  on 207  degrees of freedom
## Residual deviance:  66.115  on 203  degrees of freedom
##   (52 observations deleted due to missingness)
## AIC: 93.978
```

```
##
## Number of Fisher Scoring iterations: 14
```

```
# model predicting mediator
model.m <- lm(coalition_congress ~  log(comments) + #comment_length +
                coalition_type +  log(coalition_size) + coalition_unopposed,
               data = coalitions_coded %>%
                filter(!is.na(coalition_success)))



mediator <- list("Members of Congress in Coalition (OLS)" = model.m, "Members of Congres


modelsummary(mediator, stars = TRUE)
```

	Members of Congress in Coalition (OLS)	Members of Congress in Coaliti
(Intercept)	-0.073	-6.623***
	(0.053)	(1.113)
log(comments)	-0.022	-0.230
	(0.014)	(0.152)
coalition_typepublic	0.062	1.165*
	(0.062)	(0.652)
log(coalition_size)	0.099***	1.365***
	(0.028)	(0.302)
coalition_unopposedTRUE	0.073	-9.680
	(0.430)	(2103.363)
Num.Obs.	208	208
R2	0.075	
R2 Adj.	0.056	
AIC	242.8	94.0
BIC	262.8	110.7
Log.Lik.	-115.412	-41.989
F	4.086	

* p < 0.1, ** p < 0.05, *** p < 0.01

```
# FIXME include = TRUE when more obs
model.m %>%
  tidy(conf.int = TRUE) %>%
  filter(term != "(Intercept)") %>%
  ggplot() +
  geom_hline(yintercept = 0, color = "grey") +
  aes(x = term,
```

```
      y = estimate,
      ymin = conf.low,
      ymax = conf.high) +
  geom_pointrange( )  +
  coord_flip() +
  labs(y = "Number of Legislator Comments",
       x = "")
```

```
#TODO label "Public Pressure" and "Oversight" portions.
knitr::include_graphics(here::here("figs", "causal-oversight-2.png"))
```

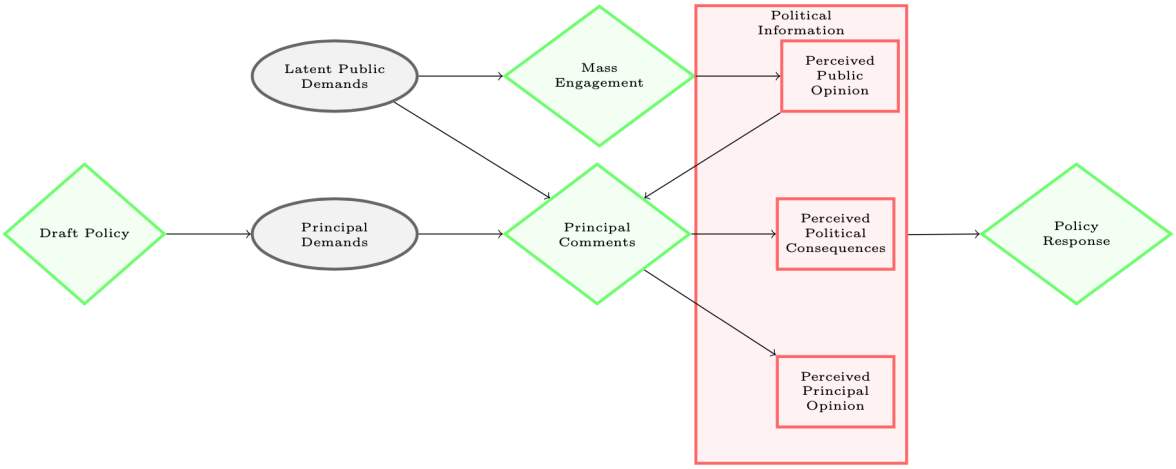


Figure 12: Integrating Public Pressure and Congressional Oversight into a Model of Lobbying in Bureaucratic Policymaking

3.2.1.1.2 Outcome model ($y_{ij} = \text{Lobbying success}_{ij}$) (3.2.1.1.2):

$$y_{ij} = \beta_0 + \beta_1 log(\text{Comments}_{ij}) + \beta_2 \text{Congressional support}_{ij} + \beta_{3-n} X_{ij} + \epsilon_{ij}$$

```
# model predicting DV
model.y <- lm(coalition_success ~ log(comments) +
                coalition_congress + #comment_length +
                coalition_type +
                log(coalition_size) +
                coalition_unopposed,
              data = coalitions_coded)

# Mediation
med.cont <- mediate(model.m, model.y,
                    sims=1000,
                    treat = "log(comments)",
                    mediator = "coalition_congress")

summary(med.cont)
```

```
##
## Causal Mediation Analysis
##
## Quasi-Bayesian Confidence Intervals
##
##                Estimate 95% CI Lower 95% CI Upper p-value
## ACME            0.00156     -0.01235         0.02   0.832
## ADE            -0.15922     -0.26285        -0.06   0.004 **
## Total Effect   -0.15766     -0.26116        -0.05   0.004 **
## Prop. Mediated -0.00432     -0.14650         0.09   0.832
## ---
## Signif. codes:  0 '***' 0.001 '**' 0.01 '*' 0.05 '.' 0.1 ' ' 1
```

```
##
## Sample Size Used: 208
##
##
## Simulations: 1000
```

```
models <- list(
  "1" = m,
  "2" = model.y,
  "3"  =  model.m
)


rows <- tibble(
  term = c("Dependent Variable"),
  `1` = c("Lobbying Success"),
  `2` =c("Lobbying Success"),
  `3`  = c("Members of Congress in Coalition")
)


# #broom::tidy(m_PR)
# cm = c("ej_commentTRUE" = "EJ Comment",
#        "log(comments + 1)" = "Log(Comments+1)",
#        "ej_comments_unique" = "Unique EJ Comments",
#        "ej_commentTRUE:log(comments + 1)" = "EJ Comment*Log(Comments+1)")


attr(rows, 'position') <- c(0)


# paper table
modelsummary::modelsummary( models,
```

Table 1: Lobbying Success and Congressional Support

	1	2	3
Dependent Variable	**Lobbying Success**	**Lobbying Success**	**Members of Congress in C**
(Intercept)	0.108	-0.259	-0.073
	(0.310)	(0.193)	(0.053)
log(comments)	-0.143***	-0.157***	-0.022
	(0.048)	(0.053)	(0.014)
coalition_typepublic	0.004	0.305	0.062
	(0.255)	(0.226)	(0.062)
log(coalition_size)	0.146	0.227**	0.099***
	(0.118)	(0.105)	(0.028)
coalition_unopposedTRUE	NA	-1.741	0.073
	()	(1.568)	(0.430)
coalition_congress		-0.051	
		(0.256)	
Num.Obs.	136	208	208
R2	0.071	0.051	0.075
R2 Adj.	0.050	0.027	0.056
AIC	480.7	782.1	242.8
BIC	495.3	805.4	262.8
Log.Lik.	-235.345	-384.036	-115.412
F	3.385	2.158	4.086

* p < 0.1, ** p < 0.05, *** p < 0.01

```
                        title = "Lobbying Success and Congressional Support",
                        stars = TRUE,
                        #coef_omit = "president.*|agency.*|Intercept",
                        # coef_map = cm,
                      add_rows = rows,
                      notes = "") %>%
 row_spec(row = 1, bold = T) #%>% kable2(file = "mediation")
```

Mediation analysis will require adding cases where coalitions lobbied unopposed, which we are much more likely to see in the sample of rules without mass comments.

The average effect of the logged number of comments, conditional on letters from members

of congress (the ACME) is 0, with a p value of 0.832.

The average direct effect (ADE) of the logged number of comments on lobbying success is -0.16, with a p-value of 0.004.

The Total Effect of a one-unit increase in the logged number of comments is -0.16, with a p value of 0. 0 of this is mediated through mobilizing congressional attention (p-value = 0.83).

3.2.2 Organization success as the Dependent Variable

While it would not be appropriate to compare the lobbying success of organizations *within* a rulemaking (because many organizations belong to the same coalition), it may be appropriate to compare the lobbying success *within* the same organization *across* rules. This limits the analysis to organizations that lobbying on multiple policies. The key variation of interest is when organizations lobby with a large amount of public support versus when they do not.

There is still a (lesser) problem with the i.i.d. assumption here because two organizations lobbying in a coalition on one rule may mobilize each other to lobby in coalition in a different rule (in my data, lobbying coalitions are at the policy-level, since they differ from policy to policy).

```
orgs <- comments_coded %>%
  filter(comment_type == "org") %>%
  distinct(org_name, docket_id, success, Position, coalition_size, coalition_comments, p
  count(org_name, sort = T) %>%
  filter(n >1, !is.na(org_name))


orgs %>% kablebox()
```

org_name

n

Natural Resources Defense Council

10

Earthjustice

9

Sierra Club

9

Oceana

7

Pew Charitable Trusts

7

National Audubon Society

6

National Wildlife Federation

6

American Bankers Association

5

American Petroleum Institute

5

Associated Builders And Contractors

5

Association Of Oregon Counties

5

Center For Biological Diversity

5

Chamber Of Commerce

5

County Of Siskiyou

5

Edison Electric Institute

5

Environmental Defense Fund

5

International Association Of Drilling Contractors

5

International Bancshares Corporation

5

Materion Brush Inc.

5

Naacp

5

National Association Of Home Builders

5

National Employment Law Project

5

National Mining Association

5

Nature Conservancy

5

Nez Perce Tribal Executive Committee

5

Ocean Conservancy

5

Port Gamble S'klallam Tribe

5

Public Citizen

5

Quinault Indian Nation

5

Aca International

4

Afl-Cio

4

American Bird Conservancy

4

Center For Regulatory Effectiveness

4

Confederated Tribes Of Warm Springs

4

Consumer Bankers Association

4

Economic Progress Institute

4

Elko County

4

Endangered Species Coalition

4

Farm Bureau

4

Harney County Court

4

Independent Community Bankers Of America

4

Institute For Policy Integrity

4

Kentucky Equal Justice Center

4

Maryland Consumer Rights Coalition

4

Montezuma County

4

National Association Of Manufacturers

4

National Wild Turkey Federation

4

North Carolina Division Of Marine Fisheries

4

North Slope Borough

4

Northeast Seafood Coalition

4

Ocean Conservation Research

4

Offshore Operators Committee

4

Portland Cement Association

4

Safari Club International

4

Snoqualmie Indian Tribe

4

Southern Ute Indian Tribe

4

State Of Alaska

4

Summit Lake Paiute Tribe

4

U.s. Chamber Of Commerce

4

Union Of Concerned Scientists

4

Woodstock Institute

4

Aarp

3

Aircraft Owners And Pilots Association

3

American Staffing Association

3

Arizona Game & Fish Department

3

Associated General Contractors Of America

3

Association To Preserve Cape Cod

3

Baker County

3

Bank Policy Institute

3

Better Markets

3

Blue Water Fishermen's Association

3

Catholic Charities Usa

3

Chesapeake Bay Foundation

3

Citizens' Alliance For Property Rights

3

City Of Portland

3

Columbia River Inter-Tribal Fish Commission

3

Competitive Enterprise Institute

3

Confederated Tribes Of Grand Ronde

3

Conference Of State Bank Supervisors

3

Conocophillips

3

Consumer Federation Of America

3

Consumer Reports

3

Defenders Of Wildlife

3

Domestic Energy Producers Alliance

3

Duchesne County

3

Energy And Wildlife Action Coalition

3

Florida Fish And Wildlife Conservation Commission

3

Florida Wildlife Federation

3

Friends Of The Clearwater

3

Georgia Watch

3

Governor's Office

3

Harding County

3

Hr Policy Association

3

International Fund For Animal Welfare

3

Maine Center For Economic Policy

3

Maine Coast Fishermen's Association

3

Maine Equal Justice

3

Mcintyre & Lemon, Pllc

3

Mesa County

3

Minnesota Deaprtment Of Natural Resources

3

405 organizations lobbied on more than one rule in the hand-coded data, some on as many as 10 rulemaking dockets. This yields a total of 1053 observations of an organization lobbying on a docket that also lobbied on some other docket. (Note: this is a undercount due to imperfect standardization of organization names).

At the organization level, the appropriate analysis is a difference-in-difference design. We know the success of each organization when it does and does not participate in a lobbying coalition that mobilizes public pressure (at least each organization that I can use for this analysis). The difference within an organization is now the key variation.

$$Y_{ij} = \boldsymbol{\beta}_1 \mathbf{Comments}_{ij} + \gamma_i + \beta_2 \text{Coalition Size}_{ij} + \beta_3 \text{Support}_{ij} + \beta_4 \text{President}_j + \epsilon_{ij}$$

Where Y_{it} represents organization i's level of success. γ_{ij} is a fixed effect for the organization. This fixed effect accounts for the organization's characteristics that do not vary over time. This difference-in-difference design ensures that coefficient $\boldsymbol{\beta}_1$ captures variation related to changes in levels of public pressure, not other factors that may vary across organizations.

β_2 captures the effect of coalition size on lobbying success of organization i on rule j. β_3 captures the difference in the success of organization i when they support proposed policy j rather than oppose it. $President_j$ is a dummy for whether policy j was proposed by President Trump rather then-president Obama's administration.

Assuming that organizations have parallel trends in their level of success given a level of support, $\boldsymbol{\beta}$ represents the average effect of changing levels of public pressure on an organization's lobbying success.

Estimates in the table below show the results of this model. It suggests that the same organization was less effective when it mobilized more comments, more successful when

they supported the rule, and less successful under president Trump than President Obama.

The negative correlation between lobbying success and the number of mass comments is likely due to campaigns "going down fighting"–not trying to influence policy. The fact that organizations are more likely to get the outcome they seek when they already support the rule makes sense because the agency is more likely to be sympathetic to their requests. The fact that the average organization was less likely to see its desired policy changes under President Trump is likely due to asymmetry in mobilizing organizations, with more organizations on the left than the right in this sample of rules. (Note: this may change in the broader sample.)

```
library(fixest)


m_fe_org = feols(success ~ log(coalition_comments) + coalition_size + Position + preside
                 data = comments_coded %>%
  filter(comment_type == "org") %>%
  distinct(org_name, docket_id, success, Position, coalition_size, coalition_comments, p


models <- list("Lobbying Success" = m_fe_org)


modelsummary(models, stars = T)
```

	Lobbying Success
log(coalition_comments)	-0.110**
	(0.044)
coalition_size	0.002
	(0.004)
PositionSupports rule	0.509**
	(0.255)
presidentTrump	-0.603**
	(0.246)
Num.Obs.	1900
R2	0.912
R2 Adj.	0.384
R2 Within	0.094
R2 Pseudo	
AIC	6297.7
BIC	15343.6
Log.Lik.	-1518.846
FE: org_name	X
Std. errors	Clustered (org_name)

* p < 0.1, ** p < 0.05, *** p < 0.01

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