

Why do agencies (sometimes) get
so much mail?

Devin Judge-Lord

Public comment periods:

Usually an insiders' game, but occasionally not.

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Does it matter?

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Does it matter?

But first:

1. What is it?

2. How do we measure it?

3. Why does it occur? (selection problems)

Selection process

Which rules?

- Significant, no deadline, less expert agencies (Moore n.d.)
- Ones people dislike? (negativity bias)
- Controversial, salient? (both endogenous)

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-> Opportunities for social movement mobilization

Mobilized civic engagement

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Who mobilizes?

- Public interest groups / "advocacy" groups (Shapiro 2008; Potter 2017) / "societal constituencies" (Balla et al. n.d.)
- Sometimes others

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-> Coalitions

Who is mobilized?

- Earnest, not so naïve (Yackee 2015)
- "Like-minded"

Whose interests are represented?

- "Second-order"" participation/representation (Seifter 2016)

Why mobilize people?

Outside lobbying

1. Expand the scope of conflict (Schattschneider 1975)

vs.

2. Leverage resources into an impression of public support

Not lobbying

3. Member expectations / recruitment

Tasks

1. Identifying coalitions
2. Measuring mass engagement
3. Which campaigns ought to matter

Identifying Coalitions

Text reuse

1. Remove text copied from proposed rule or request for comments
2. Exact match = Duplicate comments
3. 10-word moving "window" = Part copy, part unique

Word frequency

- K-means clustering
- Topic proportion similarity

Inspect and hand-code clusters (i.e. coalitions)

Political Information

“ Coalition lobbying can generate new information and new actors—beyond simply the ‘usual suspects’—relevant to policy decision makers. Thus, we theorize consensus, coalition size, and composition matter to policy change.” (Nelson and Yackee 2012)

Measuring Political Information*

Number/share per coalition

Effort per comment

Lower <-----> Higher

Duplicate (Signature) <-> Partially unique <-> Unique

Potential contagion (share of unique comments?)

*Agencies may not process comments in ways that deliver this information to decisionmakers

Selection issues

Which campaigns ought to matter?

How to tell them apart?

Selection issues

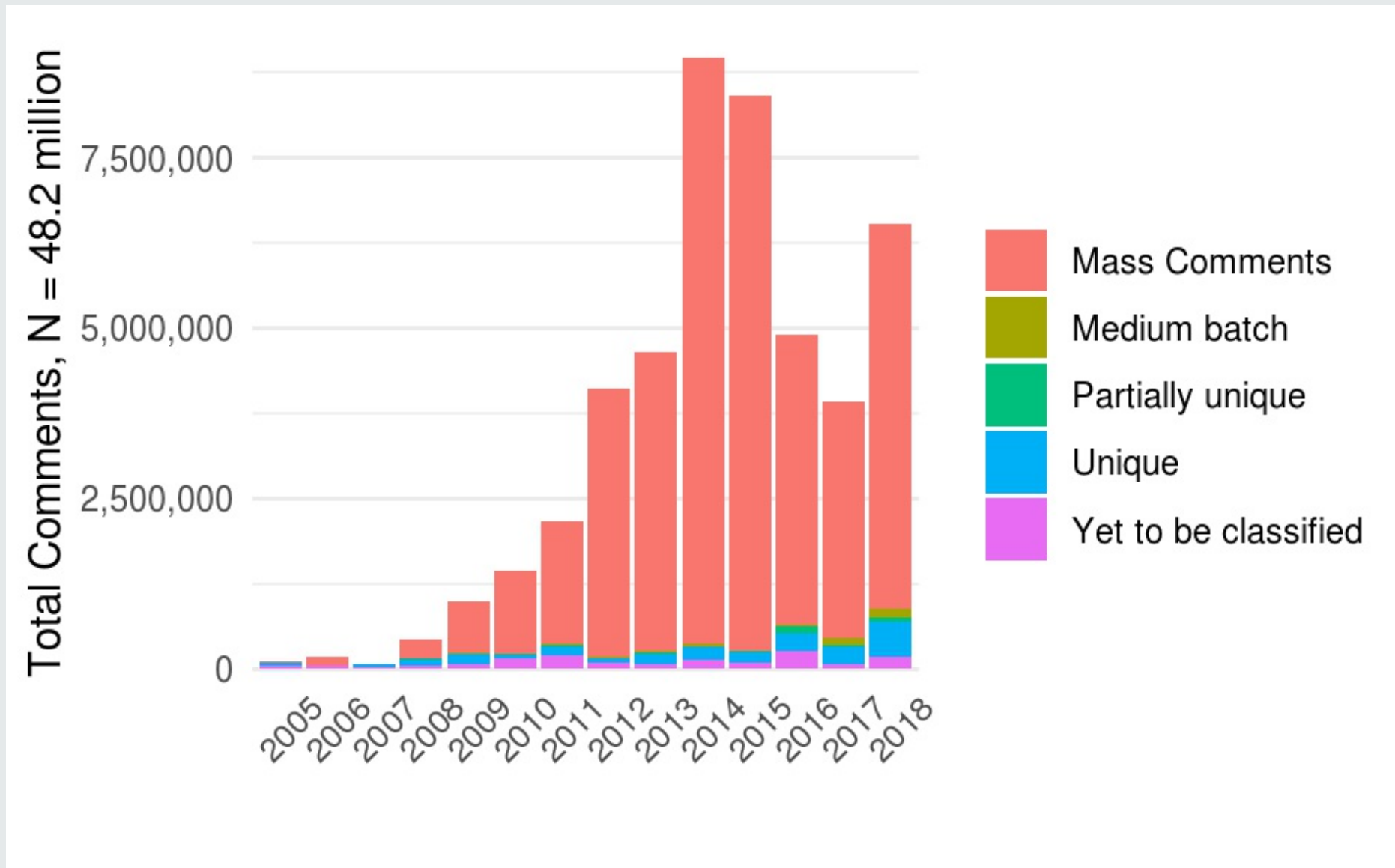
Which campaigns ought to matter?

How to tell them apart?

	Inside lobbying	Outside lobbying
"Normal" lobbying	High	None
"Going public"	High	High
"Disrupting consensus"	High	Low
"Going down fighting"	Low	High

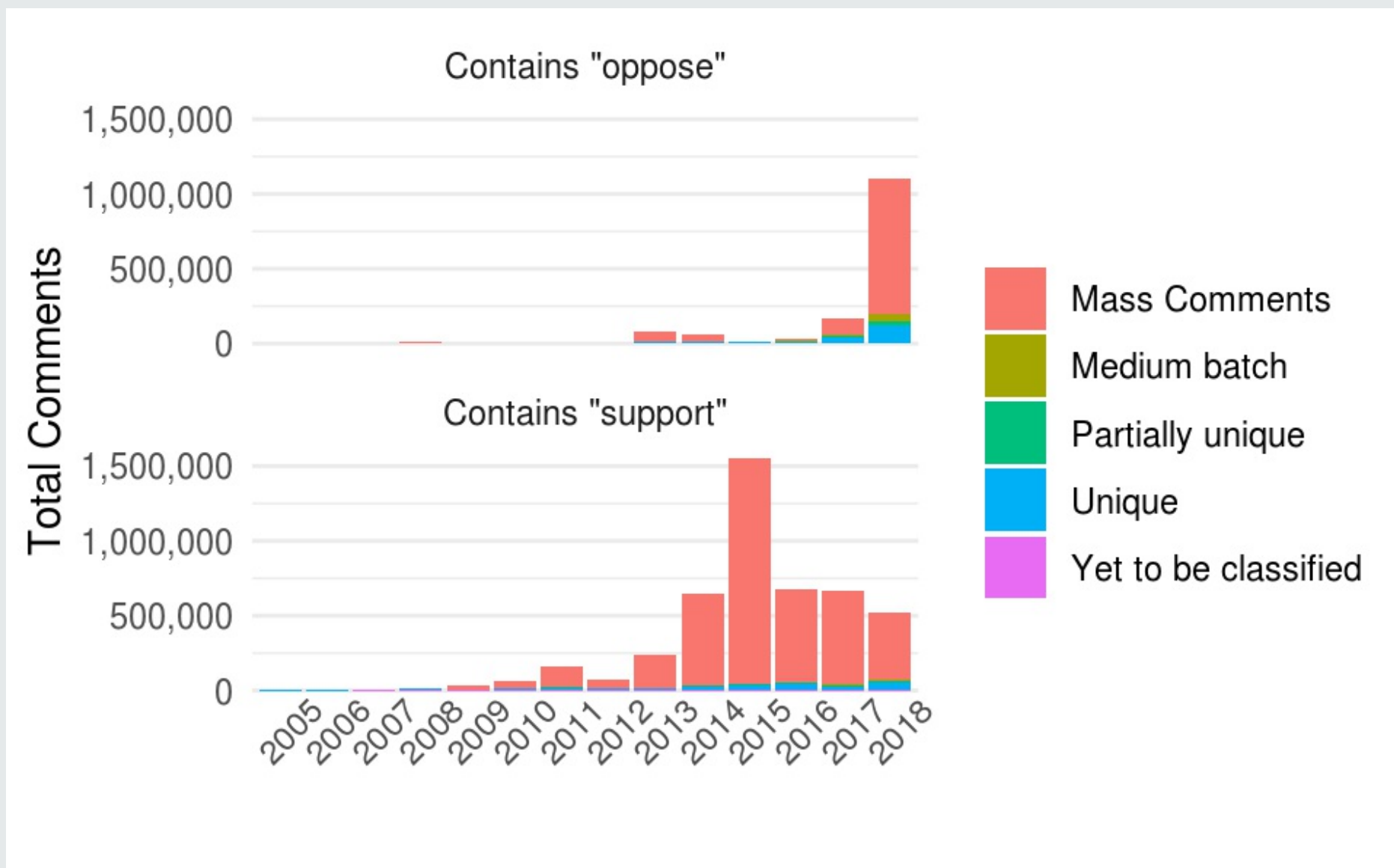
First cut

Most comments are mass comments



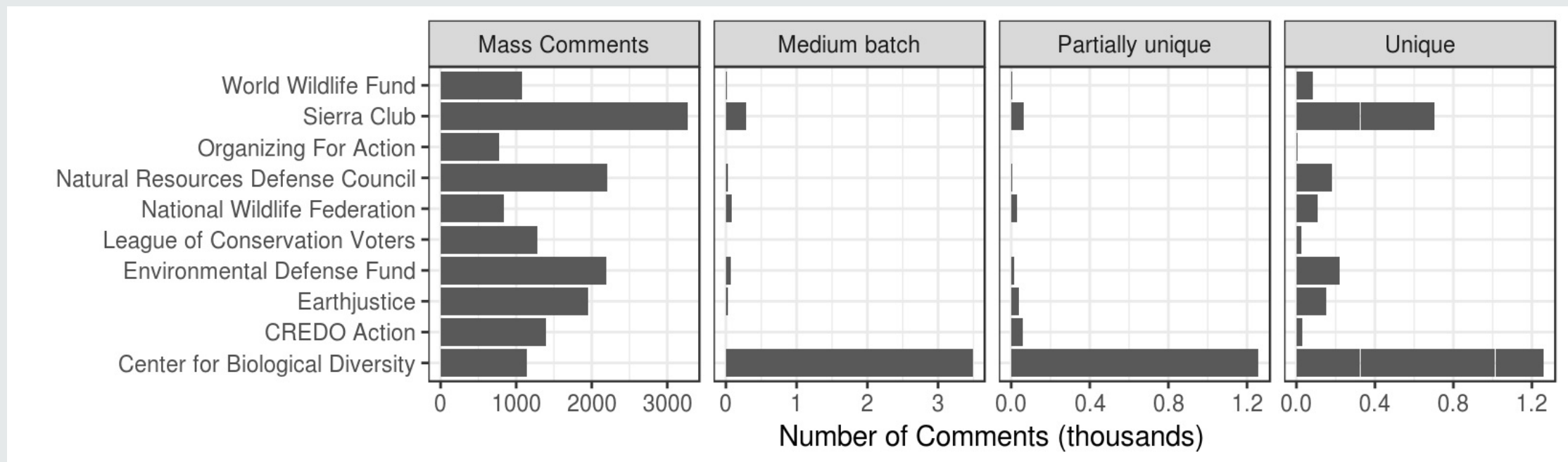
When does mass engagement occur?

Asymmetric mobilization > negativity bias



Who mobilizes?

A few public interest groups.



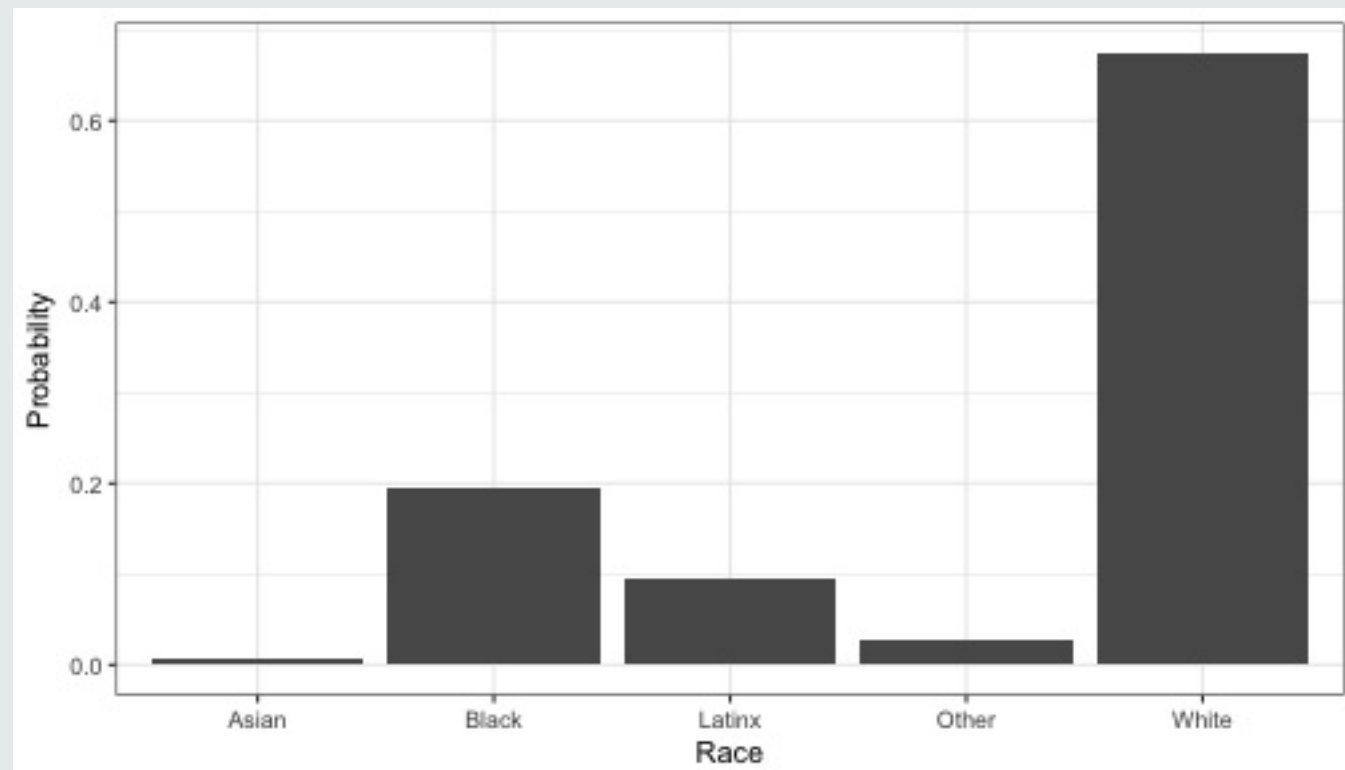
100 organizations mobilized 38.7m of 48.2m
regulations.gov comments on proposed rules

~87 lobby in public interest coalitions

Who is engaged?

Sample of 400 people in the "Environmental Justice" coalition

Estimated racial distribution (by census dist.):



Delete forever

Not spam



More ▼

Thanks!

Unified Agenda, ORIA reports, Regulations.gov (in progress):

[GitHub.com/JudgeLord/Rulemaking](https://github.com/JudgeLord/Rulemaking)

or

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