



OMB Watch
Statement for Public Meeting on Consumer Confidence Reports (CCR)
Electronic Delivery Options and Considerations
October 1, 2012

I would first like to thank EPA for organizing this meeting and for the opportunity to comment. My name is Sofia Plagakis, and I am a Policy Analyst at OMB Watch. OMB Watch is an independent, nonprofit organization that advocates for a more transparent and accountable government.

EPA's proposal lays out various options for electronic delivery but fails to provide clear standards for electronic delivery. Without clear standards in place, the proposed changes could actually reduce public access to drinking water information required by the Consumer Confidence Rule.

For instance, the proposal considers allowing water companies to just print the web address of the report on customer water bills. There are two problems with this approach. First, the links could be buried in the fine print of a routine water bill, and very few people will find them or the reports. Second, almost a third of American households are still without at-home broadband Internet and could have difficulty accessing the online water report.

Since EPA's Consumer Confidence Rule requires water quality reports to be "directly delivered" to all customers, this proposal would seem to violate the agency's own standard. We believe that water companies should be required to post water quality reports online *and* should continue mailing the reports unless customers opt out and request electronic delivery.

In addition, the retrospective review of this rule fails to address the key problem with the reports: the lax design standards, which can make it difficult for the public to understand the information contained within the reports.

This review, intended to improve outdated and underperforming regulations, is the perfect opportunity for EPA to improve the readability of the reports. For one, staff could design a standard template and test it with the lay public to ensure people understand what it means. The template should include visual indicators like those used in color-coded air quality warnings, miles-per-gallon ratings for cars, and energy usage labels for appliances.

To achieve these reforms, EPA should update the guidance and report templates that water systems use.

Thank you again for this opportunity. We look forward to discussing this issue with you.