**Template Comment for Legal Community**

**In Opposition to Proposed Asylum Ban**

DUE Monday March 27, 2023

[Access the Proposed Rule here](https://www.federalregister.gov/documents/2023/02/23/2023-03718/circumvention-of-lawful-pathways)

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This document, prepared by the National Immigrant Justice Center (NIJC), provides a template and starting place for pro bonoattorneys and other members of the legal community to draft comments opposing the Notice of Proposed Rulemaking (NPRM) issued by the U.S. government on February 23, 2023, entitled [*Circumvention of Lawful Pathways*](https://www.federalregister.gov/documents/2023/02/23/2023-03718/circumvention-of-lawful-pathways)(“Rule”). This Rule threatens to undermine asylum protections for generations to come — recycling previously enjoined asylum bans to severely restrict access to asylum and harm refugees seeking to enter the United States at the southern border.

**Comments to the Proposed Rule are** [**due**](https://www.federalregister.gov/documents/2020/06/15/2020-12575/procedures-for-asylum-and-withholding-of-removal-credible-fear-and-reasonable-fear-review#open-comment) **at 11:59 pm ET on March 27, 2023**.

Submit your comment online [here;](https://www.regulations.gov/commenton/USCIS-2022-0016-0001) we encourage you to upload your comment as a PDF.

The Administrative Procedure Act requires that when promulgating rules, federal agencies must give members of the public the opportunity to provide comment on proposed rules *and* must consider all issues and comments provided that raise a “material” issue. *See* 8 U.S.C. § 553(c); *Vermont Yankee Nuclear Power Corp. v. Natural Resources Defense Council, Inc*., 435 U.S. 519, 553–54 (1978). To trigger mandatory review, each comment must be unique. For this reason, **it is very important to individualize your comment, NOT merely copy and paste from this template**. Suggestions for areas where you might include your own analysis, anecdotes, or input are highlighted in yellow. You may include some or all of the suggested sections, or create your own new ones; do not feel bound by the structure presented here!

Some ideas for unique input include: anonymized client stories (please do not share any identifying information about a client); assessment of compliance with the Administrative Procedures Act, U.S. and international law, and the U.S. Constitution; citations to case law, journal articles, scientific studies, or investigative and human rights reports that elucidate important issues the Departments failed to analyze; and inquiry into the practical implementation of these changes for asylum seekers, attorneys, and adjudicators.

You do NOT have to write in your official capacity (e.g., as an employee of your law firm) in order to make an impact. Your training, analysis, and interest suffice to produce valuable comments. However, a submission on behalf of your firm or organization highlighting your pro bonopractice may also highlight expertise that will strengthen the comment process.

**Topics included in this template (hyperlinked):**

* [Introduction and overview of the Rule](#nqy8oaocp5ng)
* [Objection to limited 30 day comment period](#llik2y14fslk)
* [Concerns re international and domestic refugee and asylum law obligations](#9x4s84z06pj6)
* [Concerns regarding the CBP One app and making asylum access contingent on access to technology](#68qnivid189o)
* [New limited lawful pathways are not a replacement for asylum access at the border](#rh77wty3n7s)
* [Realities of asylum access in Mexico and other transit countries](#cj7pagvst9pg)
* [Compromised due process and access to counsel](#r82rb44dg856)

**Additional resources:**

* [Click-to-comment campaign](http://noasylumban.us/?utm_source=nijc&utm_medium=comment) hosted by the American Immigration Council’s Immigrant Justice Camp (provides a shorter template for those with less time to individualize);
* Human Rights First, [Biden Administration’s Proposed Asylum Ban: Illegal, Inhumane, and No Solution](https://humanrightsfirst.org/wp-content/uploads/2023/02/Biden_asylum_ban_factsheet_Feb2023_1.pdf) (Feb. 2023) (a Fact Sheet analyzing the Rule);
* NIJC, [Solutions for a Humane Border Policy](https://immigrantjustice.org/staff/blog/solutions-humane-border-policy) (Jan. 2023) (helpful for those interested in identifying alternative solutions to this Rule in their comment);
* Hamed Aleaziz, Los Angeles Times, “[News Analysis: Why the border ‘will never go back to what it was before Trump,’](https://www.latimes.com/politics/story/2023-03-02/biden-asylum-proposal-trump)” Mar. 2, 2023 (including interviews with Biden administration officials concerned that the Rule will permanently alter asylum policy).

Questions? Email Heidi Altman, NIJC’s Policy Director, at haltman@heartlandalliance.org.

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**PRO BONO TEMPLATE**

March \_\_\_, 2023

*Submitted via* [*https://www.regulations.gov/commenton/USCIS-2022-0016-0001*](https://www.regulations.gov/commenton/USCIS-2022-0016-0001)

Lauren Alder Reid, Assistant Director

Office of Policy

Executive Office for Immigration Review, Department of Justice

Falls Church, VA

Daniel Delgado, Acting Director

Border and Immigration Policy,

Office of Strategy, Policy, and Plans,

U.S. Department of Homeland Security

Washington, D.C.

**RE:** **Comments in Opposition to the Joint Notice of Proposed Rulemaking entitled**

***Circumvention of Lawful Pathways;***[**RIN: 1125-AB26 / 1615-AC83**](https://www.federalregister.gov/documents/2023/02/23/2023-03718/circumvention-of-lawful-pathways) **/ Docket No:**

**USCIS 2022-0016 / A.G. Order No. 5605-2023**

Dear Assistant Director Reid and Acting Director Delgado:

*[I/we/law firm am/are/is]* submitting the following comments to the Department of Homeland Security (DHS), U.S. Citizenship and Immigration Services (USCIS), and the Department of Justice (DOJ), Executive Office for Immigration Review (EOIR) (“the agencies”) in response and opposition to the above-referenced Notice of Proposed Rulemaking (“NPRM” or “the Rule”) issued by the agencies on February 23, 2023. *[I/we/law firm]* strongly oppose*[s]* the Proposed Rule, which will prevent current and future asylum seekers from accessing protection they merit under domestic and international law, result in the return of many refugees to harm, and leave others in the United States without stable protection.

*[I/we/law firm]* urge*[s]* EOIR and DHS to withdraw the Rule in its entirety and ensure that a full and fair asylum system is made accessible to all those who seek refuge in the United States.

*[Insert paragraph here describing your interest in this NPRM, highlighting pro bono service, experience and interest in asylum/immigration or administrative law, and concerns regarding the United States’ increasingly restrictive approach to asylum law and policy.]*

**Introduction and overview of the Rule**

The proposed Rule incorporates a new, sweeping ground of ineligibility for asylum seekers arriving at the U.S. southern border who did not seek asylum in a country of transit and/or did not obtain an appointment to present at the border using a mobile phone application known as “CBP One.” Government officials have [privately acknowledged](https://www.latimes.com/politics/story/2023-03-02/biden-asylum-proposal-trump) that this Rule will constitute a foundational shift in the U.S. asylum system, making access to asylum at the southern border the exception rather than the norm.

The proposed Rule provides that people arriving at the southern border without permission to enter will be presumed ineligible for asylum if they did not seek and receive a denial of asylum in a transit country or countries, and/or if they entered between ports of entry or at a port of entry without having obtained an appointment via a mobile application called CBP One. People subject to the Rule must “rebut” this presumption by showing the presumption was incorrectly applied to them or they fall within an exception to the rule, including rape survivors, trafficking victims, and those facing acute emergencies or other “exceptionally compelling circumstances.” Those who fail to rebut the presumption will be swiftly deported unless they can meet a heightened standard to establish their fear of return. Even then, those who meet this heightened standard will only be permitted to seek a lesser form of protection than asylum, known as withholding of removal or protection under the Convention Against Torture. These lesser forms of protection provide no path to citizenship, expose people to the perennial risk of removal to other nations, and proscribe their ability to petition for reunification with their spouse or children.

The proposed Rule violates U.S. obligations under both domestic and international law, which ensure access to protection for people fleeing persecution. Prior to the Rule’s issuance, [nearly 300 civil society organizations](https://humanrightsfirst.org/wp-content/uploads/2023/01/Letter-to-President-Biden-re_-asylum-ban-NPRM-1.pdf), more than [150 faith-based organizations](https://www.interfaithimmigration.org/wp-content/uploads/2023/01/Final-Faith-Letter-Opposing-Proposed-Asylum-Ban_Jan2023.pdf), and [nearly 80 members of the House and Senate](https://www.menendez.senate.gov/imo/media/doc/letter_to_president_biden_on_the_administrations_border_policies.pdf) called on the Administration to abandon its plans to resurrect these Trump-era asylum bans.

*[Describe here your / your firm’s commitment to ensuring that asylum seekers’ rights are protected, including due process rights safeguarded by legal representation. If you have represented an asylum seeker, consider discussing the many ways in which it is* already *challenging for people to seek and obtain asylum in the United States, and analyze how it would impact your future clients to face even more obstacles to doing so.]*

In the preamble to the Rule, the agencies highlight the pressures at the border caused by increasing arrivals. The United States is not alone in facing these pressures; the world faces [record global displacement](https://www.unhcr.org/en-us/news/press/2022/6/62a9d2b04/unhcr-global-displacement-hits-record-capping-decade-long-rising-trend.html) caused by political instability and oppression, violence, and climate change. However, the U.S. government does not need to respond to these pressures by implementing increasingly restrictive measures such as this Rule. [Many humane](https://immigrantjustice.org/staff/blog/solutions-humane-border-policy) and practical solutions are available to the administration including increasing funding to and coordination with civil society organizations providing respite on the border and throughout the United States.

*[One of the agencies’ proposed justifications for the Rule is that states, localities, and non-governmental organizations may not have the capacity or ability to provide shelter and support services to those arriving via the southern border once the Title 42 expulsions policy is lifted. Consider addressing and rebutting this notion here. If you or your law firm are committed to amplifying non-profit capacity through pro bono legal service provision, state that and describe the reasons for doing so. If you or your firm have worked with asylum seekers bused in the interior or along the border, describe ways you have observed the federal government might support civil society instead of implementing restrictive measures.]*

*[In its narrative justification of the rule, the agencies also note that while the number of people claiming fear at the border has significantly increased, the percent who are ultimately granted asylum has remained static or fallen; the agencies also seem to imply that the credible fear process should be made more stringent because many migrants pass the credible fear screening only to later be denied protection in their merits hearing. If you have represented or are currently representing asylum seekers, consider discussing the many ways the deck is already stacked against asylum seekers, especially those without legal counsel (more than half of all people in pending immigration court proceedings today). Discuss factors – that have nothing to do with the merits of an asylum seeker’s claim – that might result in a denial, such as a biased Immigration Judge, lack of counsel, cultural bias in adjudications, rushed proceedings, inadequate interpretation, etc.]*

**Objection to limited comment period**

Executive Orders governing the regulatory process ([Executive Order 12866](https://www.archives.gov/files/federal-register/executive-orders/pdf/12866.pdf) and [13563)](https://www.reginfo.gov/public/jsp/Utilities/EO_13563.pdf) require federal agencies to “afford the public a meaningful opportunity to comment on any proposed regulation, which in most cases should include a comment period of *not less than 60 days*.” In this case, however, the agencies have provided only 30 days for the public to provide comment, and they have done so over the objection of [more than 170 national, state, and local organizations](https://immigrantjustice.org/staff/blog/172-organizations-call-extension-public-comment-period-proposed-asylum-ban).

The agencies have provided no compelling reason to truncate the public comment period in this way. The justification provided in the rule largely relies on the administration’s anticipation of the end of the Title 42 policy on May 11, when the COVID-19 public health emergency will expire. This justification makes little sense, however, given that the Biden administration itself [formally sought](https://www.cdc.gov/media/releases/2022/s0401-title-42.html) to end the Title 42 policy nearly one full year ago, in April 2022 and the Department of Homeland Security [announced publicly](https://www.cbp.gov/newsroom/speeches-and-statements/statement-us-customs-and-border-protection-commissioner-chris) its efforts to prepare for the policy end that same month.

[*Insert here the ways in which the truncated comment period limited your / your firm’s ability to provide fulsome comments.]*

*[If you have experience or expertise in administrative law, explain why sufficient time (at a minimum 60 days) is pivotal to ensure meaningful opportunity for stakeholders to weigh in, and how the government appears to predetermine the outcome of this NPRM by rushing commenters to finalize a temporary final rule or interim final rule before Title 42 ends, despite months or years of anticipation that this expulsion policy would end and the fact that this Rule proposes sweeping changes to asylum law warranting thorough consideration.]*

**Concerns regarding domestic and international refugee and asylum law obligations**

The United States is obligated to the requirements of the international Refugee Convention by virtue of its 1967 Protocol. Congress codified these obligations through the Refugee Act of 1980, which provides any person arriving at a U.S. border the right to seek asylum, regardless of their status or manner of entry. The central function of this proposed Rule is to limit asylum eligibility at the southern border based on a person’s manner of entry or transit, their ability to access technology, and/or the number of appointments that DHS decides to make available on a given day. The presumption of ineligibility that arises from this function directly contravenes the principle of non-discriminatory asylum access codified by the Refugee Act.

Indeed, this central premise of the Rule recalls similar bans issued by the Trump administration, which were repeatedly [struck down](https://www.aclu.org/cases/east-bay-v-barr?document=pi-order) by federal courts. During the [time it was in place](https://humanrightsfirst.org/library/asylum-denied-families-divided-trump-administrations-illegal-third-country-transit-ban/), the Trump-era rule that banned asylum seekers based on their manner of transit resulted in migrants with strong claims to asylum being rapidly deported to their persecutors, and separated countless families when refugees barred from asylum under the rule obtained lesser protections that did not allow them to apply for family members abroad. These harms will inevitably recur under the proposed Rule.

[*If you or your firm represented individuals who were harmed by the Trump-era transit ban, describe your experiences here, including anecdotes and/or anonymized case stories. Explain how, in practice, there is little daylight between a rebuttable presumption and the categorical ban of the Trump era, when most asylum seekers are detained and unable to secure counsel during their initial fear screenings.]*

[*Discuss here your personal and/or organizational concerns regarding this Rule and the ways in which it undermines domestic and international asylum law. If you have in-person or research experience with refugee protection outside the United States, discuss the ways in which this Rule may lead other countries to weaken their own refugee protection regime, inadvertently placing even more pressure on the United States.]*

**Concerns regarding the CBP One app and making asylum access contingent on access to technology**

The proposed Rule introduces an entirely new concept into the U.S. asylum system – it renders asylum at the southern border contingent on migrants’ ability to access and properly utilize a mobile phone app prior to their arrival. All asylum seekers attempting to enter the United States between ports of entry and those arriving at ports who are subject to the new transit grounds of ineligibility will be ineligible for asylum unless they made an advance appointment to present at the port of entry using the CBP One app.

Requiring access to technology to secure asylum access fails to account for gaps in technology, language access, and economic disparities between groups of migrants attempting to use the app while fleeing harm. The result will be an asylum system that leaves behind those with fewer resources, often those in the greatest need.

*[Discuss concerns you have regarding imposing access to technology as a prerequisite for accessing asylum at the southern border. If you have previously represented asylum seekers who sought safety via the southern border, describe concerns you have about whether they would likely have had a cell phone with them, the time to wait safely in Mexico for their scheduled appointment, and/or if they would have had the access, language skills, or technological know-how to navigate a mobile app.]*

Furthermore, the CBP One app in its limited roll-out has already proven [extremely flawed](https://immigrationimpact.com/2023/02/28/cbp-one-app-flaws-asylum-seekers/?emci=c9fe0b55-bcb7-ed11-a8e0-00224832e811&emdi=43e52f43-37b8-ed11-a8e0-00224832e811&ceid=10978806): users have [reported](https://www.sandiegouniontribune.com/news/immigration/story/2023-01-22/cbp-one-app-asylum-tijuana) frequent glitches and appointments that fill up before they can access them; and the facial recognition technology is racially disparate in application, often [rejecting photos](https://www.theguardian.com/us-news/2023/feb/08/us-immigration-cbp-one-app-facial-recognition-bias) of migrants with darker skin.

*[If you have concerns and/or specific expertise regarding the racial biases that are common to facial recognition technology, discuss here.]*

*[If you have concerns and/or specific expertise regarding the privacy concerns inherent in requiring migrants seeking asylum to submit sensitive information including biometric and location data into an app prior to entering the United States, discuss here. Senator Markey has expressed these concerns in a recent letter to the administration,* [*here*](https://www.markey.senate.gov/news/press-releases/senator-markey-calls-on-dhs-to-ditch-mobile-app-riddled-with-glitches-privacy-problems-for-asylum-seekers)*.]*

**New limited parole pathways are not a replacement for asylum access at the border**

As a threshold matter, this Rule pits individuals exercising their lawful right to seek asylum at the U.S. border against individuals who can afford to apply for parole programs — describing only the latter as using “lawful” pathways. This distorts domestic and international asylum law and undermines the Biden administration’s own commitment to protect the right to asylum.

The proposed Rule attempts to justify a restrictionist approach to asylum access at the border by referring to new limited parole programs the administration has unrolled which allow a capped number of [Ukrainians](https://www.uscis.gov/ukraine), [Venezuelans, Haitians, Cubans and Nicaraguans](https://www.uscis.gov/CHNV) to come to the United States on a time-limited parole grant. As the National Immigrant Justice Center and many other civil rights organizations have [noted](https://immigrantjustice.org/staff/blog/recycling-trumps-asylum-bans-expanding-title-42-how-bidens-new-policies-threaten), parole pathways are welcome and important in the larger context of U.S. immigration policy, they should never be considered a replacement or substitute for non-discriminatory access to asylum at the border.

The new parole programs require people to apply from their country of origin or a nearby country, while seeking a passport from the government that may be persecuting them and arranging air travel and sponsorship in the United States. Practically, this means those who are in most desperate need of protection and whose flight is the most urgent will not be able to utilize the parole programs.

*[If you are representing or have familiarity with individuals who have come to the United States utilizing the new parole programs, discuss the ways in which parole status falls short of asylum status, including leaving people in legal limbo, with long delays for employment authorization, and without any guaranteed access to counsel to assist with affirmative asylum applications.]*

*[Discuss your understanding, based on your experiences or reading you have done, of the many ways in which the urgency of the need to flee means refugees will often be unable to meet the criteria for a parole program (waiting in home country to apply, accessing a passport and obtaining a U.S.-based sponsor) and need the life-saving safety net of access to asylum at U.S. borders.]*

**Realities of asylum access in Mexico and other transit countries**

The proposed Rule bans migrants from asylum eligibility if they arrive at the southern border and did not receive a denial of asylum in a country of transit. In addition to contravening what the Ninth Circuit Court of Appeals [has referred to](https://www.courthousenews.com/wp-content/uploads/2020/07/AsylumRule-9CA.pdf) as a “long line of cases” holding that failure to apply for asylum in a transit country “has no bearing on the validity of a [person’s] claim for asylum in the United States,” this ban in practice constitutes a nearly categorical bar to asylum access at the southern border. The bar will apply to the vast majority of African, Caribbean, Central American, and Latin American asylum seekers arriving at the southern border because of the lack of meaningful asylum systems in Mexico and other common transit countries.

Deficiencies and abuses in Mexico’s asylum system are [well documented](https://www.hrw.org/news/2022/06/06/mexico-asylum-seekers-face-abuses-southern-border), and those who do attempt to stay and try to seek protection in Mexico endure [systematic violence](https://humanrightsfirst.org/wp-content/uploads/2022/12/HumanRightsStainPublicHealthFarce-1.pdf) and discrimination against migrants. Other common transit countries including Guatemala, El Salvador, Honduras, and Nicaragua, are no less protective. As noted asylum scholar Karen Musalo [recently explained](https://www.justsecurity.org/84977/bidens-embrace-of-trumps-transit-ban-violates-us-legal-and-moral-refugee-obligations/): “...[N]ot one of the four countries has anything approaching an adequate refugee protection system. Guatemala’s system has been described as ‘[inadequate](https://www.state.gov/reports/2021-country-reports-on-human-rights-practices/guatemala/)’ and [cumbersome](https://www.hrw.org/report/2020/05/19/deportation-layover/failure-protection-under-us-guatemala-asylum-cooperative), and El Salvador’s as [having](https://www.state.gov/reports/2021-country-reports-on-human-rights-practices/el-salvador/) ‘major regulatory and operational gaps.’ The system in Honduras is ‘[nascent](https://www.state.gov/reports/2021-country-reports-on-human-rights-practices/honduras/),’ and those individuals who try to access it, especially women, children, and LGBTQ+ individuals, are especially vulnerable to abuse and sexual exploitation. [Nicaragua](https://www.refworld.org/pdfid/5ccabf2b7.pdf) is even more of an outlier, having ceased any cooperation with the UNHCR; in 2015 it suspended meetings of its refugee determination body, the National Commission for Refugees.”

Those who do attempt to seek asylum in Mexico or another country of transit will likely be forced to wait in conditions that are particularly dangerous for migrants for months or years while their application is adjudicated. Human Rights First has tracked [more than 13,480 reports](https://humanrightsfirst.org/library/human-rights-stain-public-health-farce/) of violent attacks on migrants blocked in or expelled to Mexico, including murder, kidnapping and rape, since President Biden took office in January 2021. [Even U.S. citizens](https://www.nytimes.com/2023/03/07/world/americas/americans-kidnapped-mexico.html?campaign_id=190&emc=edit_ufn_20230307&instance_id=87078&nl=from-the-times&regi_id=29128950&segment_id=127118&te=1&user_id=a8a7d67c7399df697a374a4c3ef6e74e) are not immune from the violence endemic to Mexican border towns, while asylum seekers are expected to wait for weeks, months, or years in those same dangerous conditions. Furthermore, it is [well documented](https://www.tahirih.org/wp-content/uploads/2022/10/Oxfam_Tahirh_Surviving-Deterrence_English_2022.pdf) that many of the common transit countries along the journey to the United States’ southern border are particularly perilous for women and LGBTQI+ migrants, who are vulnerable to the same gender-based violence many of them fled in the first place.

*[Discuss here the legal and humanitarian concerns implicit in the United States’ attempting to require refugees to apply for asylum in transit countries before arriving at the United States border. If you have represented asylum seekers subjected to metering, the Migrant Protection Protocols, the Asylum Cooperative Agreements, or other asylum bans who experienced the inadequacies of the asylum system in Mexico or Central America countries, or who faced harm in those countries because of their identity as a migrant, describe here.]*

**Compromised due process and access to counsel**

The proposed Rule will be implemented during the expedited removal process, where asylum seekers are swiftly deported without a day in court if they do not pass their fear screenings. During the threshold fear interview, asylum seekers will be required to show that the ban does not apply to them or, if it does, that they can rebut the presumption of ineligibility by proving they fall within one of the Rule’s exceptions. Those who cannot rebut the presumption will then be forced to meet a “more likely than not” standard just to be able to present a claim to lesser protections in the form of withholding of removal or CAT protection.

For those [forced to undergo this screening while in detention](https://immigrantjustice.org/staff/blog/explainer-biden-administration-plans-rapid-deportation-asylum-seekers-detained-border), the obstacles to due process are so high as to render success unachievable for most, regardless of the merits of their asylum claim. Asylum seekers will be forced through their fear interviews while in government custody in [notoriously difficult](https://www.americanimmigrationcouncil.org/litigation/challenging-unconstitutional-conditions-cbp-detention-facilities) and [abusive](https://www.hrw.org/report/2021/10/21/they-treat-you-you-are-worthless/internal-dhs-reports-abuses-us-border-officials) conditions, without prior knowledge as to the Rule’s details or workings, and only a few hours or days away from the dangers and horrors of their flight. Even if legal service providers are able to obtain the ability to provide brief orientation or consultation services prior to a credible fear interview, there will be no meaningful access to representation for refugees navigating this complex process.

*[Discuss concerns with the likelihood that this Rule will, in practice, prioritize efficiency over fairness. If you have previously represented a detained asylum seeker, describe the unique due process challenges inherent. If you have represented an asylum seeker telephonically or remotely during a Credible Fear Interview, describe the limits of an attorney’s ability to meaningfully advocate for a client during the expedited removal process.]*

*[Many people, like NIJC client* [*Iris*](https://immigrantjustice.org/staff/blog/now-my-children-can-go-outside-and-be-safe-iris-story) *(pseudonym), find the expedited removal process to be confusing and retraumatizing. If you have spoken with current or former clients about their experiences going through a credible or reasonable fear interview before meeting you, describe those insights here. Due Process barriers can also arise when asylum seekers do not have adequate interpretation at these initial interviews; if you have experienced your client struggling to understand the interpreter and therefore unable to meaningfully engage, please share examples.]*

**Conclusion**

*[I/we/law firm]* strongly oppose*[s]* the proposed rule because it violates the existing statutory framework and mandate of the Departments to protect and provide fair process to asylum seekers. *[Summarize your key objection to this rule.]* The Departments should immediately rescind the NPRM.

Thank you for considering these comments in response and opposition to this NPRM, and please contact *[me/us/law firm contact info]* to provide any additional information you might need. *I/We* look forward to your response.

*Name*

*Signature*

*Title*

*Name of Law Firm, if applicable*