



SECURE DOCUMENT DESTRUCTION
SECURE PRODUCT DESTRUCTION
RECYCLING SERVICES

April 19, 2002

Mr. John Morrall
Office of Information and Regulatory Affairs
Office of Management and Budget
NEOB, Room 10235
725 17th Street, NW
Washington, DC 20503

Dear Mr. Morrall,

We are submitting these comments in response to the request for comments on the "Draft Report to Congress on the Costs and Benefits of Federal Regulations" in the Federal Register on March 28, 2002.

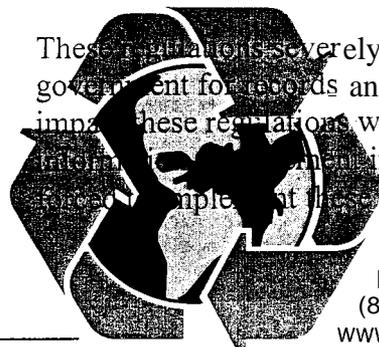
Name of Regulation: Disposition of Federal Records

Regulating Agency: National Archives and Records Administration

Citation: 36 C.F.R. Part 1228
Specifically the following sections:
1228.228(b) multi-story design/certification requirement;
1228.230(b) compartmentalization requirement;
1228.230(e) roof fire rating requirement;
1228.230(i) column fire resistance rating requirement;
1228.230(l) limitation of sources of heat; and
1228.230(s) fire detection and suppression system compliance certification requirement.

Authority: 44 U.S.C. ss 2104(a), 2904, 2907, 3102, 3103.

We are a confidential document destruction company and a member of the National Association for Information Destruction. We reviewed PRISM's comments and suggestions on the above referenced regulations issued by NARA and completely support its position.



These regulations severely impact our ability to pursue business with the Federal government for records and information destruction. We are also concerned about the impact these regulations will have on future trends in our industry and in the records and information management industry. If the records and information management industry is forced to implement these standards in order to receive Federal contracts, it is conceivable

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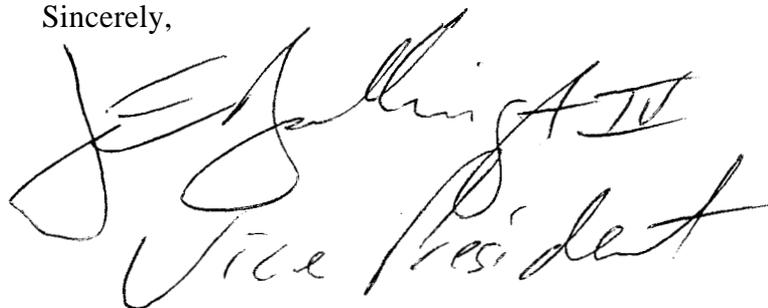
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that these facility requirements will needlessly permeate the industry. If that happens, small businesses will be unable to compete with the larger companies that can more easily absorb the up-front costs of retrofitting facilities or the additional costs for new construction.

The Federal government should not be dictating how the private sector does business, particularly when issuing such burdensome facility and fire safety standards. If anything, the government should look *to* the industry to see if the commercial standards in place are working before forcing a change.

We seriously hope that you will re-examine this issue and recommend deleting the sections of NARA's regulations that are so unreasonable.

Sincerely,



J. Shilling IV
Vice President



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