

## PROCEDURES FOR WRITTEN SUBMISSIONS

All formal written submissions sent on behalf of the National Association of Bond Lawyers (NABL) are coordinated by NABL's Director of Governmental Affairs to ensure consistency, accuracy and quality of correspondence. Standard procedures for NABL written submissions are listed below.

- The NABL Board of Directors, Chairperson of the appropriate committee, and NABL Director of Governmental Affairs decide to submit formal written correspondence on a proposed project.
- The project is assigned to a project chairperson, who will lead the project in consultation with the Board liaison to the appropriate committee.
- The project chairperson forms a task force or comment group, which will be composed of NABL members and may include industry experts or other third parties. Project participants must agree to comply with the NABL Conflicts Policy. (Note: Non-NABL members generally will not be listed on the task force/working group roster when the written submission is made, unless the NABL Board of Directors decides otherwise.)
- Generally, before principal drafting begins, the project chairperson and task force or comment group will produce an outline of the issues to be addressed and of the proposed order in which the issues will be analyzed and addressed, with summary references whenever possible to the supporting legal authority that is expected to be cited. The outline will be circulated for review and comment to the Chairperson of the appropriate committee, the Board liaison to the appropriate committee, and the NABL Director of Governmental Affairs, any of whom may solicit additional review and comment on the outline from other members of the NABL Board of Directors.
- The project chairperson and task force or comment group collaborate to produce a draft document, taking into account any feedback received in the outline review process. The Chairperson of the appropriate committee, the Board liaison to the appropriate committee, and NABL Director of Governmental Affairs generally should be copied on all project-related correspondence.
- For any project with an externally-imposed deadline (for example, comments on proposed IRS regulations), the project chairperson and the Chairperson of the appropriate committee will make best efforts to assure that a substantially final draft of the submission has been completed not later than two weeks before the deadline. For projects not having an externally-imposed deadline, the Chairperson of the appropriate committee will establish a schedule for completion of a substantially final draft, after consulting with the Board liaison to the committee.
- When a substantially final draft of the submission has been completed, the project chairperson submits it to the Chairperson of the appropriate committee, the Board liaison to the appropriate committee and NABL's Director of Governmental Affairs.

- NABL Governmental Affairs staff reformats the document on letterhead and edits for clarity and consistency; the Chairperson of the appropriate committee reviews and approves the draft, making any necessary substantive changes.
- NABL Governmental Affairs staff submits the final draft to the NABL Board of Directors for review.
- Once the final draft is approved by the NABL Board of Directors, NABL Governmental Affairs staff sends the final version electronically to the intended recipients (or in any other format that may be required). All members of the task force or comment group are copied on the submission.
- NABL Governmental Affairs staff promptly forwards the submission to the NABL Board of Directors.
- NABL Governmental Affairs staff posts the submission on the NABL web site.
- NABL Governmental Affairs staff publishes a NABLNET Alert to members with a link to the online copy.
- NABL Governmental Affairs staff posts a press release on the web site and distributes to public finance industry participants, government officials and members of the press.

Adopted: February 17, 2010