



Trachtenberg School of Public  
Policy & Public Administration  
Columbian College of Arts & Sciences

## 2021 TSPPPA Conversation Series

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Wednesday, July 28<sup>th</sup>

5:00pm-6:00pm

[Register for this session](#)

### Mass, Bots, and Fake Comments on Rulemaking

[Steven Balla](#), Co-Director - GW Regulatory Studies Center

[Bridget Dooling](#), Research Professor - GW Regulatory Studies Center

[Susan Dudley](#) (Moderator), Director - GW Regulatory Studies Center

Thanks to advances in technology, it is easier than ever for interested individuals and organizations to submit comments on proposed agency regulations. When the Federal Communications Commission proposed repealing net neutrality regulations a few years ago, it received in excess of 20 million comments. Although obtaining input from diverse stakeholders is good for regulatory policymaking, technological advances have also created a number of management challenges for agencies seeking to incorporate input into their final rules. Millions of net neutrality comments were submitted under false identities, in many instances by computer generated entities rather than humans. The sheer number of comments with duplicate language made it complex for the FCC to identify unique content. Over the past year, Steve Balla and Bridget Dooling have served as consultants to the Administrative Conference of the United States (ACUS), an independent government agency dedicated to improving the administrative process. Along with a distinguished group of colleagues, they have authored a comprehensive report on computer generated, mass, and falsely attributed comments. This report served as the basis for recommendations recently issued by ACUS on improving agency practices in managing these types of technology-enabled comments. Steve and Bridget will discuss their work and associated recommendations, which are positioned to become standard practice in the years ahead due to the fact that ACUS recommendations carry great weight in the government.

**Stay tuned for sessions with other Trachtenberg professors and friends this Fall**