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03/26/2003 09:02:53 PM

Record Type:Record

To: Lorraine D. Hunt OIRA ECON GUIDE/OMB/EOP@EOP
cc:
Subject: cost benefit analysis values life?

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March 26, 2003

Office of Information and Regulatory Affairs Lorraine Hunt
Office of Management and Budget, NEOB
Room 10202, 725 17th Street, NW
Washington, DC 20503

Dear Office of Information and Regulatory Affairs Hunt:

The "OMB Draft Guidelines for the Conduct of Regulatory Analysis and the Format of Accounting Statements" determines that saving the life of an elderly person is worth less than saving the life of a younger person.

The analysis proposes to devalue the life of a human over 70 to 2/3 that of the rest of the population and lowers the established EPA price tag of a human life from \$6.1 million to \$3.7 million.

This seems to me to be based in assumptions that violate age discrimination statutes. How can you claim someone's life is less valuable because they are older? Federal employment laws prohibit discrimination on the basis of age, but that is exactly what this analysis proposes.

Please reconsider this analysis, and if such an analysis must be made, at least base it on current, relevant data, rather than outdated information being used in a realm outside its original purpose.

Sincerely,

Dennis R. Sherman