

Gentlemen:

In response to the rulemaking notice of October 30, 2015, concerning discovery procedures, I suggest that instead of rewriting the portion of the regulations concerning enforcement, that you clearly state in 1201.73 that discovery applies to all phases of Board proceedings before judges, the initiation of which must start within 30 days of the judge's order acknowledging the initiation of the proceeding (e.g., appeal, enforcement, damages claim, counsel fee claim, etc.).

Best regards,

Peter Broida