Federal Comment Letter Template

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Key findings

- Leading a comment letter with its specific ask, rather than background, is the single change NANA's policy team credits most for staffers acting on a letter rather than filing it unread.
- A joint coalition letter with peer associations helped secure eased federal employee conference-travel limits in 2025, evidence that a shared ask carries weight a single organization's letter sometimes can't on its own.
- Letters that cite a specific provision number of a proposed rule, rather than responding to the rule as a whole, draw a more substantive response from agency staff than letters that comment generally.
- A single well-documented member story, paired with a broader data point, carries more weight in a comment record than either an anecdote or a statistic alone.
- Comment letters submitted with time to spare before a deadline, rather than in the final days of a comment period, are more likely to prompt a follow-up question from agency staff before the record closes.

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Why section order matters more than length

A federal docket clerk and the agency staff who review a comment record read hundreds of letters during a single rulemaking, most of them arriving in the final days before a comment

period closes, and a long letter with its central point buried on page three competes poorly against a shorter letter that states its ask in the first sentence. NANA's own policy team learned this less from any external guidance than from its own filings: letters built around a fixed section order — ask, then impact, then technical basis — consistently draw more substantive engagement than letters organized around whatever point the drafter found most interesting to write first.

This template is built around that same section order, the one NANA's policy team uses in its own comment letters, including its 2026 testimony before the Postal Regulatory Commission. Director of Public Policy Simone Radcliffe said the team arrived at the order the hard way, after an early comment letter drafted in a more traditional legal-memo style — background first, analysis in the middle, request at the end — drew no visible response from the agency at all, while a shorter letter filed the same year with the ask up front prompted a follow-up call from agency staff within a week.

The template does not set a fixed length requirement, since a letter's appropriate length depends on how much technical basis its ask needs, but it does recommend that whatever length a letter runs to, the first paragraph alone should be able to stand on its own if nothing else gets read.

Section one: the ask

The template's opening section states the letter's specific request in one or two sentences, before any background on the association or the rule itself. A comment letter is not required to open this way, but doing so gives a reader who stops after the first paragraph — which a busy agency staffer often will on a first pass — the letter's essential content anyway. The drafting notes for this section warn against a common mistake: opening with a description of the association's membership or mission, material that belongs later in the letter, not in the section a time-pressed reader is most likely to actually finish.

Section two: the member impact

The second section explains what the proposed rule would mean specifically for the association's own members, in concrete terms rather than general ones. "This rule would raise costs for our members" is weaker than a specific figure or a specific operational change a member organization would need to make, and the template's drafting notes include an example drawn from a past NANA filing that quantifies a projected cost increase for a defined category of member organizations rather than describing the impact in the abstract.

Section three: the technical basis

The final substantive section lays out the technical or legal basis for the letter's ask, citing the specific provision of the proposed rule at issue and any data, prior agency guidance, or comparable rule the letter relies on. This section can be the longest of the three, but the template's notes caution against letting its length crowd out the letter's earlier sections — a reader who reaches this section has already decided to engage with the letter's substance, and the technical basis should reward that attention rather than repeat the ask already made.

Citing evidence a regulator will weigh

A single member's story humanizes a comment letter's ask but rarely carries a comment record on its own, and a statistic without a concrete example can read as abstract. The template's guidance is to pair the two: a specific member organization's situation, described with enough detail to be credible, alongside a broader data point showing that situation isn't an isolated case. NANA's own filings typically draw the broader data point from the State of Associations survey

or a relevant State of Associations Quarterly brief, when the topic overlaps with data the research team already collects.

Referencing a specific provision, not the whole rule

Comment letters that respond to an entire proposed rule in general terms draw a more general response from agency staff, if they draw a response at all. The template's drafting notes recommend identifying the specific section or provision number the letter's ask concerns and referencing it directly, which signals to agency staff that the letter's author engaged with the actual text of the rule rather than reacting to a summary of it.

Coordinating a comment letter with coalition partners

Not every comment letter needs to stand alone. NANA has filed as part of a coalition of peer associations when a proposed rule affects a shared priority broadly enough that a joint letter carries more weight than several similar individual letters filed separately — the eased federal employee conference-travel limits secured in 2025 followed exactly this kind of coalition letter. The template's coalition section covers what changes when drafting jointly: the ask needs to be one both organizations can sign without qualification, which sometimes means narrowing an individual association's preferred ask to the subset every coalition partner agrees on, and the member-impact section needs examples each partner is comfortable citing publicly under a shared signature.

Coalition letters take longer to finalize than a single-organization letter, since every signing partner needs a chance to review language before it's submitted, so the template recommends starting the coordination conversation as soon as a rule affecting multiple associations is identified, rather than waiting until close to the comment deadline to propose a joint filing. A coalition letter also needs a single designated drafter who owns incorporating every partner's edits, since a document with no clear owner tends to accumulate conflicting changes from multiple partners editing in parallel.

Adapting the template for a small association

A small association without a dedicated policy or government-relations staff member can still use this template, but the drafting notes flag where a small-staff association should adjust its approach. The technical-basis section is the one most likely to need outside help: an association without in-house policy expertise should consider asking a coalition partner, a member with relevant subject-matter expertise, or outside counsel to review that section specifically, rather than skipping it or writing it more thinly than the letter's ask deserves.

A small association also often lacks its own survey data to cite in the evidence section, unlike NANA's own filings, which can draw on the State of Associations survey. The template's guidance for this case is to cite a specific, well-documented member example in detail rather than a general statistic the association doesn't have, since a single credible example, described with real operational specifics, does more work in a comment record than a vague claim about "many members" experiencing an effect the letter can't quantify.

Submitting and tracking a comment

A letter should be submitted through the docket's designated public comment system, with enough time before the deadline to confirm the submission was received and appears in the public docket, since a letter that fails to submit correctly in the final hour of a comment period cannot be resubmitted. The template includes a short checklist for confirming a submission and a note on when to expect any response, which for most rulemakings arrives only in the agency's

eventual response to comments published with the final rule, not as an individual reply to each commenter.

Once a comment period closes, the template recommends checking the docket periodically for the agency's eventual final rule or response-to-comments document, which sometimes references specific comment letters by name or by the issue they raised. Finding a letter's argument addressed directly in a final rule's preamble, whether the agency agreed with it or not, is useful confirmation that the letter was read and considered rather than simply logged. NANA's policy team keeps a short internal record of every comment letter it files alongside the eventual outcome, which over time has become its own evidence for which drafting choices actually move an agency and which don't.

A comment period that closes before a letter is ready is a real possibility, particularly for a small association without dedicated policy staff, and the template does not pretend there's always a good answer. A short, less thoroughly researched letter filed before the deadline is generally better than a stronger letter filed late, since a late submission risks exclusion from the record entirely; an association facing this trade-off should aim to file something making its core ask clearly, even without the fuller technical basis a later, better-resourced letter might have included.

Using the template with the course and the podcast

The template pairs with the Writing a Federal Comment Letter course, which walks through each section live and covers what to do if a comment period closes before a letter is ready. It was released the same week as an episode of the NANA podcast in which Radcliffe discussed what kills a comment letter fastest — burying the ask past the first page — a companion conversation for anyone drafting their association's first federal comment letter.

Members using the template for the first time should treat the section order as the one non-negotiable element and everything else — length, tone, how much technical detail to include — as adjustable to their own association's specific ask and available evidence.

A quick pre-filing checklist

- The ask appears as a single sentence on the first page, not buried in a closing paragraph.
- The docket number is checked against the current notice, not an earlier or superseded one.
- The letter is filed with time to spare before the comment period closes, not on the deadline itself.