The Process Should Be Transparent and Indude Full Engagement and Participation by the Public
All Estimates Should Undergo Proper Peer Review
The IWG Should Explicitly Limit the SC-GHG Use Outside of Regulatory Impact Analyses

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ш.	IWG Should Review Its Major Modeling Assumptions Inputs and Presentation of the Estimates in Line with the NAS Recommendations and OMB Guidance



raise significant questions about whether the assumptions used in the model will hold over none them a century