



EXECUTIVE OFFICE OF THE PRESIDENT

OFFICE OF MANAGEMENT AND BUDGET

WASHINGTON, D.C. 20503

JUL 25 1978

Mr. J. W. Miller
Organization Resources
Counselors, Inc.
1625 I Street, N. W.
Washington, D. C. 20006

Dear Mr. Miller:

I am responding to your June 14 letter to Mr. McIntyre emphasizing the need for an economic impact analysis of OSHA's generic standards for toxic substances which pose an occupational carcinogenic risk.

The intent of Executive Order 12044, "Improving Government Regulations", is to require agencies to analyze the economic effects of their anticipated regulations early in the formulation stages. As Dr. Bingham has noted, it is difficult to conduct meaningful analysis for a generic standard when specific definitions have not been established. However, when generic standards will, upon promulgation, preempt later regulatory decisions, then the economic effects of significant regulatory alternatives may never be analyzed.

You have highlighted an important concern which could have fundamental effects on the way agencies make regulatory decisions. It is a complicated issue which we have discussed with Dr. Bingham's staff. They have agreed that a regulatory analysis will be done for the generic standards and we will continue to work with them on the design of the analysis.

Thank you for your interest in this important area.

Sincerely,

Stanley E. Morris
Deputy Associate Director for
Regulatory Policy and Reports
Management

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