

We are co-chairs of the Steering Committee of the Financial Service Industry (FSI) users of EPA databases, located in New York. We represent the interest of over 10,000 potential users of EPA data in the financial services industry. We have participated in the June 19th, 2008 meeting between EPA and FSI at Region 2 offices in NYC. We have also participated in several planning meetings with EPA staff prior to this larger more public meeting. Our Steering Committee exists to ensure the continued dialogue between EPA and FSI on EPA database use in investment analysis.

General Comments:

We are very supportive of the Strategy as currently described. We wish to emphasize our agreement with the following points:

- establishing a clearer understanding of the full range of environmental information across the federal government, with a special focus on EPA databases;
- EPA should be the data clearinghouse for ALL federal environmental information and should take the lead on ensuring that the range of all environmental data is described in one internet location;
- consideration of the different levels of technical capabilities/resources/and language barriers, particularly since the FSI is a global industry;
- accessibility (including technical issues of format, EPA's logic of the content and technical organization of databases, and the ability to download the raw data itself for further analysis);
- timeliness and frequency of data release/update, the lag time between EPA's receipt of information and public release thereof;
- reliability, particularly with respect to changes in reporting requirements over time and how this affects trend analysis;
- consistency within a database

Furthermore, clarifying the regulatory, ecological, economic and financial risks associated with each database is essential for FSI users, particularly those not familiar with EPA databases.

Specific Comments:

For the purposes of the FSI we would like to see:

- A dedicated website for FSI users, listing EPA and other Federal databases commonly used by FSI analysts and brief description of how the EPA database is of value in assessing a company's environmental risk
- It is absolutely critical that parent company identifiers be included on all facility submissions to EPA databases, preferably by both stock ticker and Market Identifier Code. Without this information the mainstream FSI use of EPA databases is seriously jeopardized.
- Access to the raw data, rather than pre-specified query functionality

- Ensuring full compliance with existing EPA reporting requirements
- Engagement with other federal agencies, and the SEC in particular, to assure increased transparency on environmental risk in corporate reports

We identify three critical obstacles to mainstream FSI use of EPA data (bureaucratic, technical and content):

- 1. The need to establish the authority of OEI as the main coordinator and source of EPA environmental information from ALL EPA program offices to**
- 2. ensure full compatibility across EPA datasets**
- 3. using a common set of identifiers, preferably at the corporate level.**