rrc staff OPINION

*Please Note: This communication is either 1) only the recommendation of an RRC staff attorney as to action that the attorney believes the Commission should take on the cited rule at its next meeting, or 2) an opinion of that attorney as to some matter concerning that rule. The agency and members of the public are invited to submit their own comments and recommendations (according to RRC rules) to the Commission.*

AGENCY: SHERIFFS' EDUCATION AND TRAINING STANDARDS COMMISSION

RULE CITATION: 12 NCAC 10B .2004

RECOMMENDED ACTION:

 Approve, but note staff’s comment

X Object, based on:

 Lack of statutory authority

X Unclear or ambiguous

 Unnecessary

 Failure to comply with the APA

 Extend the period of review

COMMENT:

In (1)(d)(i), it is not clear what is meant by "possessing a law degree under [one of the Commissions]."

Robert A. Bryan, Jr.

Commission Counsel

rrc staff OPINION

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AGENCY: SHERIFFS' EDUCATION AND TRAINING STANDARDS COMMISSION

RULE CITATION: 12 NCAC 10B .2102

RECOMMENDED ACTION:

 Approve, but note staff’s comment

X Object, based on:

 Lack of statutory authority

X Unclear or ambiguous

 Unnecessary

 Failure to comply with the APA

 Extend the period of review

COMMENT:

In (1), it is not clear what is meant by "possessing a law degree under [one of the Commissions]."

Robert A. Bryan, Jr.

Commission Counsel