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U.S. DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
Office of the Chief Information Officer
High Performance Computing and Communications
Attn: Ms. Wendy Schumacher
NOAA Freedom of Information Officer
Public Reference Facility (SOU1000)
1315 East-West Highway (SSMC3)
Room 9719
Silver Spring, Maryland 20910

Re: Supplement to New FOIA Fee Waiver Request
Accompanying New FOIA Request No. DOC-NOAA-2014-001694

Dear Ms. Schumacher:

The Institute for Trade, Standards and Sustainable Development (ITSSD) hereby submits this supplement to its previously filed Request for Fee Waiver (*filed 9/22/14*) relating to new FOIA Request No. DOC-NOAA-2014-001694.

This supplement provides additional material and relevant evidence of ITSSD's satisfaction of NOAA's six-factor fee waiver test of 15 C.F.R. §4.11(k)(1)-(3) which your office should take into consideration before issuing its final determination of ITSSD's Fee Waiver Request.

Three articles recently published by *InsideEPA*, *The Daily Caller* and *WorldCoal.com* provide further evidence of ITSSD's specific intent, competence and ability to disseminate to a broad public audience the requested records, once disclosed by NOAA, and subsequently compiled, analyzed, edited and explained by ITSSD and its Board of Advisors. These NOAA records include *inter alia* copies of contracts that NOAA had entered into with the National Research Council of the National Academy of Sciences, and with numerous universities then participating in NOAA grant-funded climate science research-related programs.

In addition, these articles provide further evidence that ITSSD's dissemination *inter alia* of such records of NOAA contracts, which has not been previously publicly disclosed by NOAA or the media (i.e., of "the deep interconnections existing between NOAA, the USGCRP/CCSP, NOAA grant-funded universities and nonprofit institutes, the NRC/NAS, and each entity's respective scientists"), will substantially contribute to and improve public understanding of: 1) critical government operations and activities; 2) the relationships between those operations and activities and numerous NOAA-funded third-party entities that assisted NOAA and current and prior U.S. governments in developing and shaping the ten climate science assessments that supported EPA's 2009 Clean Air Act GHG Endangerment Findings; and 3) the impact of such interconnections and interrelationships on the

NOAA and third-party peer reviews performed on such assessments, and their conformance with relevant IQA peer review (objectivity/bias, intellectual independence and conflicts-of-interest) standards applicable to HISAs.

ITSSD heretofore provides hyperlinks to the following articles for the NOAA National FOIA Office's consideration:

1. *InsideEPA* (9-22-14) –

<http://nebula.wsimg.com/5e890d840d33ed7349a12718552dabab?AccessKeyId=39A2DC689E4CA87C906D&disposition=0&alloworigin=1>

2. *The Daily Caller* (9-26-14) –

<http://dailycaller.com/2014/09/26/climate-change-chicanery-and-the-federal-agency-academic-complex/>

3. *WorldCoal.com* (9-30-14) –

<http://www.worldcoal.com/news/power/articles/World-Coal-ITSSD-challenges-the-the-legality-of-the-scientific-basis-for-EPA-greenhouse-gas-regulation-coal1375.aspx#.VCqyUvldWSp>

Additional media articles and published working papers are also forthcoming.

ITSSD appreciates and trusts that NOAA's National FOIA Office will take this new relevant and material information into account with respect to its determination of our Fee Waiver Request.

Please do not hesitate to contact me should you have any questions or comments.

Very truly yours,

Lawrence A. Kogan

Lawrence Kogan
CEO
ITSSD