



in the current system must be sent to the Secretary of the Commission. This is done “to ensure that persons in decision-making and advisory positions receive identical copies of submissions in a uniform and impersonal manner.”<sup>1</sup> The underlying reason for this practice is a sound one as it not only facilitates document and information uniformity, but also allows for all filings to go through a central location before dissemination within the Commission.

Another one of issues to address that is discussed in 46 C.F.R. § 502.2 is the need to collect contact information.<sup>2</sup> Contact information for those submitting documents is vital to a successful communication and interaction. Using a system in which one must first register or subscribe will allow the Commission to not only know and identify from where the submission originated, but collect the contact information necessary through the tailoring of the registration fields. This system will be able to tag and file all documents from the same source with the necessary contact information. This in turn will increase efficiency and eliminate the possibility of not knowing the source of a document. Traditional mail allowed for the chance that one may have forgotten to include all necessary contact information or just did not include it. This oversight will be corrected by requiring one to register in order to submit a document. Additional steps can be taken to ensure objectivity or anonymity as well.

Finally, an issue may arise with online certification.<sup>3</sup> Currently those who submit via E-mail must include a certification that the electronic copy is true and correct, in addition to filing signed paper copies via traditional mail. An automated system in which a user would have to register could also provide the ability to certify through either some form of an agreement page in the submission process or an e-signature. This will eliminate the need for the signed paper copies and improve efficiency.

#### b. Electronic Filing Systems

I have utilized various forms of electronic delivery systems throughout my education. Overall, the ability to submit and accept documents in electronic form improved efficiency and organization. Additionally, the creation and implementation of cloud computing has revolutionized the way in which individuals create and collaborate files. Systems such as Blackboard, Goggle Docs and Dropbox all demonstrate viable options and possibilities for an online submission system. The truly perfect system would be one that meshed the strongest aspects of these type of programs into a government created entity that would help to ensure security and efficiency.

Cloud computing is the concept that there is a remote location and server from which multiple users can access information from anywhere and in a variety of means. This allows for simultaneous collaboration with the file staying in one place. No longer will it be necessary to send the file from person to person via email or other means. Implementing a system such as this could allow those in the Commission who need to see the documents to have access anywhere, not just in paper form in the office. Additionally, those who submit files can do so with ease.

---

<sup>1</sup> 46 C.F.R. § 502.2(a) (2011).

<sup>2</sup> Id. § 502.2(t)

<sup>3</sup> Id. § 502.2(f)(3)

Blackboard is a system I have used in educational settings. It is a wiki-based technology in the sense that it allows for real-time collaboration from multiple parties. One can submit files and documents on this system as well as receive updates from administrators and other collaborators. This program has many positive aspects that could be incorporated into a model for the Commission. To begin with, Blackboard is highly programmable and adaptable. The administrator of the specific location or page will be able to control its appearance as well what can be accessed. The Commission would benefit from having a central location as such with multiple options. One would be able to upload documents into an already organized system, further improving efficiency. Additionally, the ability to communicate and update those who are a member of the group will allow the Commission to keep the parties informed as to their docket.

I have used the Goggle Documents system in both professional and educational settings. This is a service through Goggle that allows users to share and collaborate in real-time on a variety of types of documents. One of the best qualities in this system is the ability to designate who can access and who can collaborate the files. One must be invited or "shared" the document in order to access it and must gain a new level of designation in order to collaborate on it. This is an important concept that can be implemented in a system for the Commission. The current practice of the Commission is to receive the filings in a centralized location (the Secretary) from where said document would be disseminated to the necessary viewers. Being able to "share" a file works in the same way as only those who are supposed to be viewing the document will be privy to access.

Although I have not personally used the Dropbox system, it demonstrates many of the strong qualities of cloud computing. The idea behind Dropbox is that you have one folder on each registered device that will continually update and be the same across multiple mediums. The files will also be accessible from the Dropbox website, in a case where one may not be in front of one of their native devices. These two concepts illustrate a tremendous advantage to the Commission implementing a cloud computing type of submission system. For example, a folder can be created for the docket, and within this file could be individual files for each item on the docket. The necessary parties can have the docket folder on their personal devices and will be updated automatically and without email or transmission via foot and hand. All the necessary files will be accessible from one location. Furthermore, This will still allow for the documents to be submitted to one central location prior to internal dissemination pursuant to 46 C.F.R. § 502. Additionally, those who need access will be able to do so from anywhere, even if their personal devices are malfunctioning. The ability to have the documents backed up in this manner will ensure efficiency and hopefully less lost time trying to locate a misplaced file.

A system that incorporated these aspects would improve the submission of files and the docket of the Commission greatly, for the public and the agency itself.

c. Benefits

The world has reached a point in which paperless communication has become the normal mode of communication. Information is relayed via email almost instantly and documents are exchanged across the globe with the click of a button. The ease and comfort that this ability affords has allowed many organizations to go paperless and therefore save natural resources in

addition to the time and staff it takes to physically organize these important documents. An online submission mechanism and system will allow for the Commission to reap the benefits of this modern technology in many ways. To begin with, the Commission will be able to save time spent scanning and manually inputting documents received into their databases and reading room. Additionally, time will be saved in locating a document as one will not have to pour through filing cabinets, but instead can search a database from any device connected to the system. Multiple users will be able to access the document at once and in a way that will not waste time and labor by producing photocopies and manually delivering these documents. Time can also be saved when looking for a specific aspect of a document through computerized "find" searches, as opposed to scanning through what may be a long submission. The ease and efficiency of this system would be greatly appreciated.

Reliability of an electronic submission system is also a benefit. Technology has reached a point where the available options are dependable enough to allow for a paperless transition. Although this is seen as a benefit, everyone has had issues with computer shutdowns, so it will not be without flaw. By having the documents backed up through servers and multiple digital locations within and outside of the actual agency location, this concern can be calmed. Additionally, the use of a government-designed system would hopefully lend itself to a higher degree of reliability and ease of access. An online submission system will also lend itself to a more reliable submission timestamp, as one will no longer have to wait for the document to come in the mail.

In addition to the systems I have used, a plethora of others can be found using a simple Internet search. This can be seen as a benefit to implementing newer technology as there are many providers, which will hopefully drive competition and in turn newer innovation.

d. Concerns

Although commercial systems may be more widely used and therefore possibly more native to a community member, their implementation does create concerns. To begin with, The Commission is a government entity and security would be of utmost concern. A system created and maintained by the government could afford a greater ability for security by cutting down the number of parties involved in a transfer. Assuming a third party source or host could be seen as an extra stop on the transfer or submitting of documents, allowing direct submission to the Commission would also improve the efficiency of the entire effort. By requiring the use of a government created submission system, the Commission would be able to trust that a commercial third party source had not tampered with the documents or their transmission.

An additional concern comes from the nature of technology. Although many are at the cutting edge in terms of knowledge, time will most likely have to be spent on training for this new system to run efficiently. It will be a worthwhile investment though as the time saved will pay off for years to come. Also, it may cut off those constituents who do not have access to a computer. Almost anyone could submit by mail, but everyone does not have either the access or knowledge to successfully submit online. Although it is most likely a small segment of the population, measures would have to be taken in order to combat this issue.

### III. Conclusion

The Commission deserves commendation for its decision to explore the modernization of its Rules of Practice and Procedure. By soliciting public comment, the Commission can explore the ways in which to better serve and interact with the community. The implementation of a cloud computing submission device would streamline efficiency and reduce the staff labor that is a product of a world reliant on paper. The paperless push will increase the effectively of the Commission and ensure that it can best met the needs of the public for years to come.