

Public Comment

As a Learning System

Deriving greater value from public comment and response

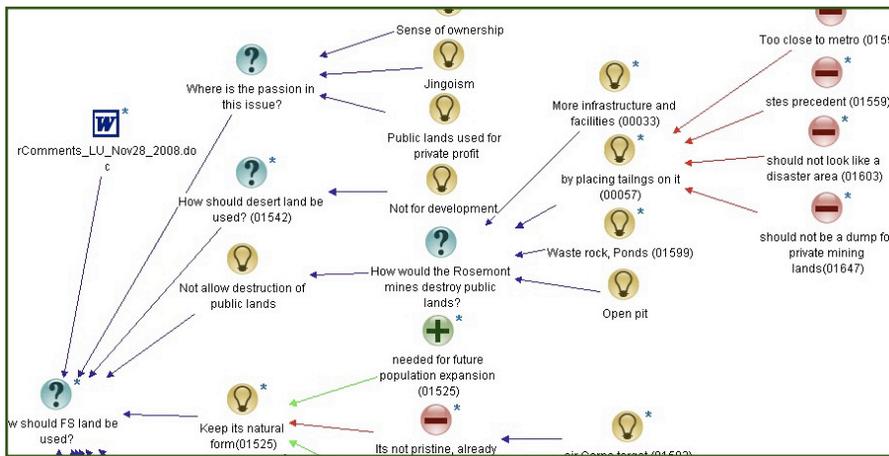


Figure 1. Example of a dialog map used to map “comment space.”

The focus of this interactive workshop is on a novel technique for analyzing public comments and reporting the results back to the public. We think the technique supports a shift to a learning system. But you will soon realize that the specific technique itself—while it is very exciting and practical—is not our main interest. What we want to do, together

with you, is to envision a comment analysis system that leads to something better than mutual frustration. No, not some sort of diaphanous visioning. Real change.

Today, enjoy hands-on using real comments, a little cyber-talk, and the chance to think about what commenting could be.

Learning Systems
 A learning system is one that has

- a robust flow of information, both substantive and procedural, along many vectors;
- a traceable, accessible link between information and action;
- substantive knowledge and action improve and are known to improve; and
- feedback systems are in place so that communication capacity improves over time.

This definition is influenced by discussions about learning organizations, but it addresses learning across organizations and with unorganized members of the public.

COMMENT ANALYSIS IN CONTEXT

Today, we focus on the specific design challenge of analyzing and reporting on NEPA comments as part of a learning system. We would be remiss, however, if we didn't provide materials about the *context* of comment analysis, which we sometimes describe as an expensive reinforcing cycle of public disenfranchisement and agency frustration. Improving comment analysis and

reporting by itself would make a substantial change to this pattern, but there are some much more profound changes worthy of consideration:

- Approach the commenting cycles as public affairs opportunities;
- Design decision-making processes that are conducive to eliciting and acting on good comments. This requires using a common

platform for outreach, analysis, and decision-making. For instance, if a lot of the agency's work is done through GIS mapping, then people should be able to get on those maps and learn about the project and comment using GIS maps;

- Publicize commenting opportunities to reach beyond the circle of cognoscenti;
- Design elicitation of comments that is graphically pleasing, written in plain language, presented on and off the web;
- **Offer timely, engaging, clear feedback on the comments with the option, as appropriate, of involving the public in the analysis and summary of the public's materials;**
- Address the comments and incorporate them into the subsequent work in a clear and traceable manner.
- Consider this work as a long-term investment in agency-public relationships.

Public commenting is a system. That means that if we fix one part without attending to the rest, we are just cranking more efficiently towards disaster. For instance, if we succeed in increasing the number and quality of comments, yet the comment analysis and reporting remains frustrating, the situation is not improved. Cool websites, interactive opportunities, cogent explanations of the leverage points in decision-making--these don't matter unless comment analysis is up to the task.

If there is one link in the system that is more equal than the others, it is the feedback on the feedback: comment analysis.

In systems analysis, kinks in the feedback often are crucial, so it makes sense to focus on comment analysis.

Another reason comment analysis is so important is that it goes back to the very most basic mediation principle: the importance of active listening. We define active listening as communication in which (a) the listener understands what the speaker is saying, (b) the speaker *knows* s/he has been understood and (c) both the listener and the speaker improve in their shared communication capacity. Active listening is satisfying to the speaker and listener, even if they do not agree.

What makes active listening so great?

First, we know that when a speaker gets feedback "I heard you, and this is what I understood," then s/he often will shift to a less combative frame--more relaxed, more able to listen, likely more creative.

Second, the completed communication loop creates a "learning system." The listener receives feedback about how well he listens; the speaker receives feedback about how well she speaks. They teach one another to listen and speak better.

This is the key thing missing in commenting under NEPA. Because of the delays and distortions in the feedback, both the public and the agency folk are part of an *un*learning system: a recipe for misery and lawsuits.

So what would a good comment analysis system look like? It needs to:

- Meet legal requirements;
- Be efficient and timely;
- Complete the feedback loop;
- Deal with repeat comments in a way that is efficient and satisfying to the speaker and the listener;
- Summarize the comments in a manner that captures the passion as well as the nuts and bolts; and
- Provide different kinds of design opportunities depending on the situation (a range of expense, iterations, collaboration etc).

Today, you are going to play with one approach, dialog mapping, in a promising experiment to satisfy these criteria. We frankly do not care whether you use this approach or--perhaps better yet--invent your own. We present this approach as a way of sparking your creativity and interest in coming up with a better way to create a learning system for commenting under NEPA.

Dialog mapping uses Issues-Based Information Systems. (For more information about IBIS, we recommend Jeff Conklin's book, *Dialog Mapping*, in tandem with the excellent shareware, *Compendium*.)

The experiment you'll participate in today "maps comment space." In combination with topic-based computer sorting, we are exploring this as a promising technique for comment analysis that also has the potential

to be done collaboratively with the public. It allows for flipchart and nonstinky pen activities in workshops, asynchronous collaborative webwork, and a range in collaborative approaches. The range extends from having agency or consultant comment analysts prepare the maps and then validate with the public, to actually building all aspects of the maps collaboratively.

These maps would then form the basis for the agency's development of comment summaries.

Facilitation Design

The larger issues about the range of design possibilities and the tradeoffs between time, cost, and robustness of collaboration will have to be addressed in another workshop (.... book, treatise, or performance art). Likewise, I think the efficacy of dialog mapping in group work, and specifically comment mapping, is a workshop in and of itself--it touches on so many cognitive, psychological, social and justice issues.

This little sidebar is only about the exercise to the right. If you are interested in group work design, notice that the group is self-facilitated, and that the focus and leadership naturally shifts from one person to the next around the table. The high status person is always established, but everyone gets a turn.

There are several things a participant needs to touch and handle; that gives people an outlet for their tension when they are first forced to sit at a table with their potential adversaries. It also supports kinesthetic learning. Likewise, each person will stand up every few minutes.

In the instructions and exercise, the redundant, traceable, and iterative nature of the work--the real work--is belabored. We want people to feel safe to engage in give and take, knowing there will be many opportunities to catch errors or rethink concessions.

Agenda

- 3:30 Introductions (Panelists)
- Objectives of the Session (Fox)
- Commenting Seen Through Lens of Communication Theory (Dewar)
- 3:45 Plenary discussion (all)
- 3:55 Context for case study
 - the proposed Rosemont Copper Mine (Fox & Murphy)
 - Computational pre-sorting and public validation (Murphy)
- 4:05 Issues-based Information Systems to map comment space (Fox & Murphy)
- 4:15 Group Exercise: mapping comment space... collaboratively (Fox/all)
- 4:40 Reflections from an Agency Perspective (Frost)
- 4:45 Discussion and wrap up
- 5:00 Adjourn

Collaborative Comment Mapping Exercise

Building the Real Comment Map (Groups)

- a. Take turns at the map: The person who has the earliest birthday in the year reads his comment, suggests adding it to the map at a particular place, and if this addition makes sense* to everyone, he writes the comment number in the appropriate place. If colleagues disagree, then put the comment to the side. He should do one comment and then sit down. Now the person to the right gets up and repeats the same. Continue working through the comments in this way.
- b. As you map, don't just map substantive things (water temperature, number of ferrets, miles to the gallon); if this map is to be resonant, you must map relationship and procedural issues: fear, trust, timing, (dis)enfranchisement, connection to place, sorrow, anger... if it's in the comment, put it on the map.
- c. As the discussion evolves, if the way is not clear, it's probably a good strategy to remember *this is a whiteboard for a reason*. Pick an alternative and note the hesitation on the flipchart. (The person with the hesitation writes those notes.) As your map evolves, the strengths and weaknesses of your choice will become clear, and you can make changes.
- d. As you proceed, some parts of the map will feel sturdy, and others will seem to want to fall in on themselves. As a group, discuss the changes you wish to make. Call in a facilitator whenever you feel the inclination! (By the way, reorganization of the map can be a very good thing.)
- e. Starting the maps off for you saves oodles of time in explaining dialog maps in the abstract. The best way to "get" dialog mapping is to jump into one. But... it's a whiteboard for a reason. Feel free to redesign the maps!

* 'Makes sense' means it's a reasonable working hypothesis, and if you have to go back later and change it once the dialog map evolves, you can and should do that. If you find yourselves sweating over one comment, put it aside or just make a temporary decision. That will actually help you most in finding your way.

Lumping and Splitting.... Someday we are sure someone will identify the lumping and splitting gene--people differ so clearly on this. If there is a splitter contingency in your group, you are probably better off just going with that as the group norm. It is easier to lump later. And we think you will find that your group comfort level will become strong enough that the lumping decisions emerge and the group naturally finds its comfort zone.

REPORTING

Dialog mapping is a wonderful means of reporting on the comments. In some ways it is more powerful and satisfying than a narrative (linear) summary. It certainly makes a good companion piece.

Whatever technique you use, it should offer symmetric traceability: anyone can start with a particular letter, see how the comments were parsed, and find their comments. Likewise, they can look at a node and quickly trace it back to the comments, seen in context of the entire letter.

The strong image, recording of substantive, procedural and relationship issues, and traceability result in the "I've been heard" feeling occurring at very large scales.

USEFUL LINKS

Philip's info about presorting : <http://www.daylightdecisions.com/ddweb/Report%20on%20an%20Experiment%20in%20Comment%20Analysis.pdf>; This document: <http://www.daylightdecisions.com/ddweb/Comment%20Analysis%20DOI%20Conf%202010.pdf>.

http://www.decisioncafe.com/dhroot/dhowners/wopro/mro/wp_Slideshow.asp?QSHT=DH_NOBODY&QSMID=298&QSDBT=MSSQL This was part of the 'Spring Forum' as we beta-tested the use of MCDS for WOPR. (Log in your values on the first such screen to see how we helped people understand the decision space.) For a report on WOPR, see www.foxmediation.com.

<http://gsnm.ecr.gov/> a Murphy/Fox interactive website, was designed to increase collaborative capacity by luring people to talk about the *actual* controlling legal text.

<http://gsnmvibe.ecr.gov/hike/> Interactive modeling (multi-criteria decision support).

Contributors

PHILIP MURPHY



Philip Murphy has a Ph.D. in theoretical physics, a company that makes decision communication

tools, and a desire to empower the citizens and experts alike.

www.infoharvest.com.

CARIE FOX



Carie Fox is a retired public policy mediator, soil scientist, and lawyer.

www.foxmediation.com.

NICHOLAS DEWAR



Nicholas Dewar has more than two decades of experience helping groups build

consensus on a wide range of complex issues. mediation and facilitation, He also provides training. Nicholas designed an innovative conflict management system for the unionized workplace of a city government.

RICHARD FROST



Rick Frost is the Associate Regional Director for Communications and External Relations for

the eight-state Intermountain Region of the National Park Service. Prior to joining the NPS, Mr. Frost spent ten years on Capitol Hill, working on both House and Senate staff.

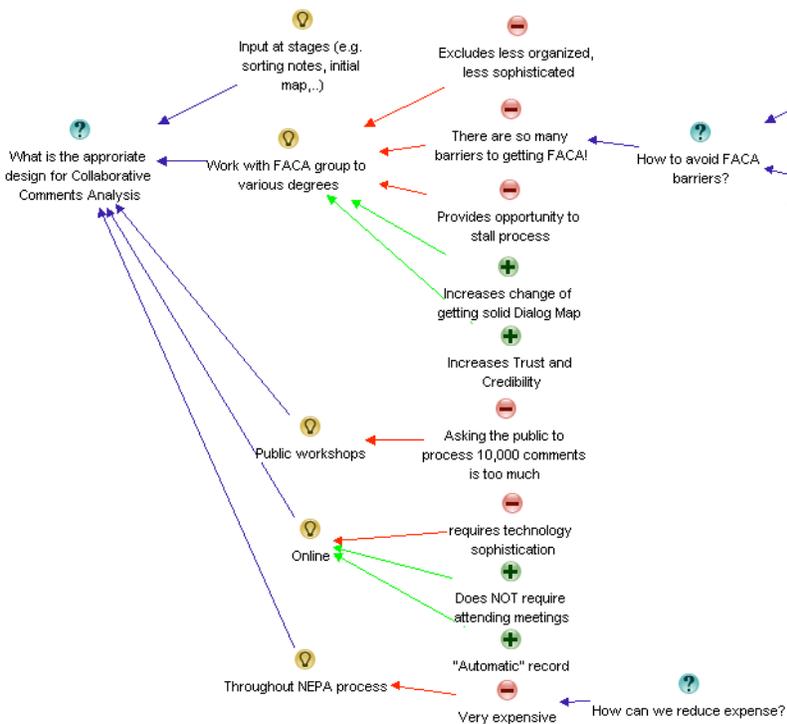


Figure 2: Draft Argument About Comment Analysis Design.