**Pros and Cons of Three Initial Reports & Comment Periods in Phase 1 v. Two Initial Reports**

Pros:

* Allows WG to make incremental progress by focusing on fewer questions and possible requirements. “It also gives us all the opportunity to play a stronger and more thorough oversight role at each step. . . dividing the work this way, will allow us to do a better job at looking at each of the fundamental questions set by the WG charter.”
* There are only so many issues we can work on at once, and to stick with the big 3 provides a focus and direction. **“**It simply allows us to chew off the amount of work we can handle at any one given time.**”**
* Allows additional/earlier opportunity for public comment
* It may be premature to consider accuracy and gated access when we have not yet established if there is a basis for collecting registration data in the first place.
* **“**I do not understand how we look at Data Access and Accuracy before we know what the data elements and users/purposes are.**”**

Cons:

* Delays deliberation on inter-dependent questions
* May impede attempts to balance privacy, access, and accuracy issues as requested by board and charter
* Adds overhead for WG and community (additional workload associated with running two vs. three public comment periods both from a staff as well as WG perspective as well as impact on the overall timeline)
* There is a risk of public comment fatigue so the WG will need to give consideration to whether there are any downsides to having three public comment periods on the same topic vs. two.
* There’s a reason the charter was written as is and to change it unwinds the charter without the benefit of the thoughtful work and deliberations that went into it.
* Discussions may be held without full perspective.
* If we put some elements aside, that prevents a holistic consideration of the subject and creates the potential for ambiguity and misunderstanding (e.g., what would one assume about gated access if it's not part of the discussion -- that it solves all problems, shouldn't be considered (i.e., we are assuming full public access), or what?).
* There are other ways to obtain input besides publishing an Initial Report and holding a public comment period.