My name is Mike Keegan, I am a policy analyst with the National Rural Water Association, which has over 30,000 small and rural community water supply members. Most all of our members are community water systems and therefore must comply with the Consumer Confidence Report requirements – many serve populations over 1,000 persons and are not eligible for the mailing relief provisions in the Safe Drinking Water Act.

Small and rural communities support public access to all drinking water quality information – it is the public who own and manage their local water supplies through their local governments.

Small and rural communities urge the EPA to adopt the proposed “notification that [the] CCR is available on website” option included in EPA’s draft options for electronic delivery because this option would result in: additional drinking water quality information for consumers, improved accessibility and constantly available consumer information, and greatly reduce the cost of distributing the reports.

This option would improve public access to the CCR information by allowing the information to be available constantly on the internet (not only once a year), make it easier for water systems to timely update the content of the information, and would not be cost-prohibitive to include additional drinking water information. Consumers without internet access would still be provided a paper copy of the CCR. The financial savings from paper publishing, copying, mailing, and from potentially maintaining a complex consumer email data-system would be an appreciated cost savings to local communities. Small communities often have competing public expenditures and limited funding – and adoption of the “notification that [the] CCR is available on website” would allow local communities to more effectively meet their competing public health challenges.

Small and rural communities often have a difficult time, due to their limited customer base and limited resources, when it comes to providing safe water and compliance with federal standards. This is compounded by the fact that small and rural communities often have lower median household incomes and higher water rates compared to larger communities. As a result the cost of compliance is often dramatically higher per household. The vast majority of U.S. water supplies are small, 94% or 47,495 of the 51,651 community water systems serve a population less than 10,000 people. There are approximately 16,255 water regulated public sewer systems in the U.S.; 13,057 sewer systems are considered small – serving less than 10,000 persons. EPA asserts, “Because small communities tend to be economically disadvantaged, under-served and resource-poor, they face significant barriers to building and maintaining effective wastewater treatment services.”

Thank you for the opportunity to comment on this important issue.