

Online Appendix

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1 Additional Details on Constructing the Dataset

There are 18,092 comments from proposed rules on Medicare Part B Fee Revision Schedules.¹ Some of the commenters are medical professionals while others are not. We constructed this dataset under the assumption that a “John Smith” from Florida who commented on the proposed rule and is also in the National Physician Index is a physician. Measurement error will tend to attenuate our estimates unless physicians with unusually large losses are more likely to share their names with non-physician commenters. The bias would be problematic if we systematically mapped citizens to specialties that suffered abnormally large losses.

To match the commenters to the correct physicians we used several techniques. First, we used regular expressions on Regulations.gov’s title interface to get 18,104 names from the titles of comments. To ensure we did not exclude names in the bodies of comments we ran Stanford’s Core NLP on the text of the comment attachment (usually a PDF we batch converted to TXT). We removed any names that we knew to be officials at CMS such as Kerry Weems and Andy Slavitt.

To link physicians to their reported states, we used regular expressions for short state names (e.g. CT), long state names (e.g., Connecticut), and phone number area codes. When dealing with two letter state abbreviations we made sure the abbreviation was either preceded or followed by a space or a dash to ensure that we were picking up state abbreviations and not text which happened to contain a state abbreviation. We found states for 15,653 of the comments. Of these states, we used the state given in the title of the comment 15,407 times. The other 246 states came from a mixture of phone number area codes and long state name (excluding Connecticut and Wisconsin as the Department of Health and Human Services (the parent agency of CMS) and CMS have facilities on Wisconsin and Connecticut Avenues in Washington DC).

¹These rules can be identified by the following RINs: 0938-AR11, 0938-AR56, 0938-AS12, 0938-AS40. Since RINs contain final rules that allow comments, the total comment count for these RINs is 23,200.

Of the comments with states on the proposed fee schedule revisions, we matched 8,200 unique NPI numbers to 5,179 physicians. Of these physicians we matched 259 on their first name, middle initial, last name, and state, and 4,823 using first names, last names, and state. The over 3,000 duplicate NPIs come from a combination of institutional NPI numbers which have a physician who commented and is the contact person for that institution and doctors with the same name. We deal with multiple NPI numbers and by merging the commenting data with the Medicare utilization data and dropping all NPIs not associated with a physician. This process eliminates NPIs used by medical institutions (e.g. surgical centers). For example, a Colorado based Urologist who directs a surgical center matches four separate NPI numbers. By using the Medicare utilization data we can eliminate NPI numbers that are not his personal number.

What happens if there are multiple doctors in the same state with the same name? We do not systematically distinguish between the doctors and include all of them in the commenting panel. As we argue above, this is the conservative choice because it biases our results downwards: incorrectly matching commenters to doctors disproportionately samples from specialties relatively unaffected by the changes in the proposed rules. These doctors also make up a small portion of our dataset; of the duplicate doctors, there are only 148 that make it into the final dataset.

Additional Analysis

Variable Descriptions and Sources

For descriptions of measures of stakes, see the text and footnotes 2 and 4.

Table A1: Other Variable Descriptions and Sources

| Variable | Source | Units | How is it measured? |
|---|----------------------|------------|---|
| Allowed charges | Util | Dollars | Average Medicare allowed amount per procedure per doctor times the number of times the doctor performed that procedure |
| Procedure Concentration | Util | N/A | A Herfindahl-style index; for physician i in year t , the sum over all procedures of squared shares of allowable charges. Ranges from 0 to 1. |
| Geographically Adjusted Salary (logged) | Medscape/ PFS/NPI | Dollars | Average salary per specialty by Medscape, geographically adjusted using PFS weights |
| Any donations/Democrat | DIME | Percentage | More than 2/3 of a doctor's total donations are to Democrats |
| Any donations/Republicans | DIME | Percentage | More than 2/3 of a doctor's total donations are to Republicans |
| Any donations/Split | DIME | Percentage | If a doctor donates more than 1/3 to Democrats and Republicans |
| Percent of contributions to Republican candidates | DIME | Percentage | Percent of a doctor's contributions to Republicans. |

NPI = [National Physician Index](#)

PFS = [Physician Fee Schedule](#)

Util = [Medicare Provider Utilization and Payment Data](#)

DIME = [Adam Bonica's Database on Ideology, Money in Politics, and Elections](#)

Table A2: Descriptive Statistics

| | Mean | Obs | SD | Min | Max |
|--|--------|-----------|-------|--------|--------|
| Gains (logged) | 1.631 | 1,890,175 | 1.407 | -3.311 | 6.203 |
| Losses (logged) | 0.915 | 1,937,582 | 1.330 | -3.612 | 6.706 |
| Any gain | 0.634 | 1,937,582 | 0.482 | 0.000 | 1.000 |
| Allowed charges (logged) | 10.830 | 1,937,582 | 1.541 | 2.886 | 16.929 |
| Procedure concentration | 0.348 | 1,937,582 | 0.239 | 0.019 | 1.000 |
| Salary (logged) | 5.534 | 1,645,534 | 0.262 | 5.039 | 6.422 |
| Any donations/Democrat | 0.038 | 1,937,582 | 0.192 | 0.000 | 1.000 |
| Any donations/Republican | 0.051 | 1,937,582 | 0.219 | 0.000 | 1.000 |
| Any donations/Split | 0.004 | 1,937,582 | 0.060 | 0.000 | 1.000 |
| Percent of contributions to Republican candidates | 0.399 | 69,613 | 0.479 | 0.000 | 1.000 |

Material Stakes and Commenting

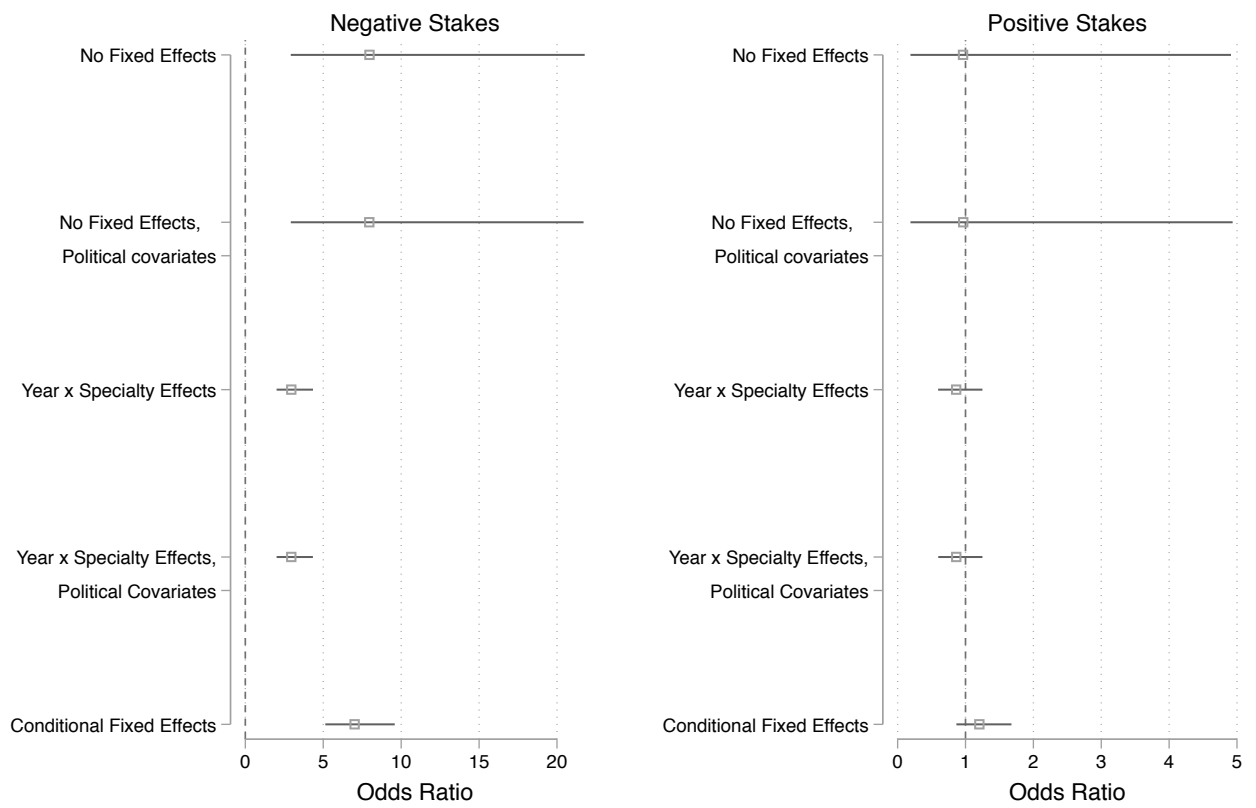
Table A3: Estimating the Likelihood of Notice and Comment Participation: Logit and Conditional Fixed Effect Logit Estimates

| | (1) | (2) | (3) | (4) | (5) |
|----------------------------|---------------------|---------------------|---------------------|---------------------|----------------------|
| Gains (logged) | -0.013 (0.308) | -0.012 (0.308) | -0.054 (0.070) | -0.054 (0.070) | 0.069 (0.063) |
| Losses (logged) | 0.810*** (0.200) | 0.810*** (0.200) | 0.423*** (0.077) | 0.422*** (0.077) | 0.761*** (0.062) |
| Any gain | 1.300 (0.721) | 1.294 (0.722) | 1.055*** (0.320) | 1.053*** (0.318) | 0.962*** (0.187) |
| Allowed charges (logged) | -0.322* (0.154) | -0.323* (0.154) | 0.018 (0.079) | 0.016 (0.079) | -0.251** (0.089) |
| Procedure concentration | -1.317** (0.411) | -1.320** (0.411) | -0.088 (0.170) | -0.090 (0.170) | -0.207 (0.330) |
| Salary (logged) | 3.594*** (0.822) | 3.587*** (0.822) | -6.741** (2.566) | -6.699** (2.576) | 3.807*** (0.728) |
| Any donations/Democrat | | 0.100 (0.140) | | 0.144 (0.172) | |
| Any donation/Republican | | 0.234 (0.144) | | 0.179* (0.077) | |
| Any donations/Split | | 0.294 (0.279) | | 0.216 (0.207) | |
| Year Effects | Y | Y | Y | Y | Y |
| Specialty×year effects | N | N | Y | Y | N |
| Provider effects | N | N | N | N | Y |
| $H_0 : Losses - Gains = 0$ | 0.824*** (0.224) | 0.822*** (0.224) | 0.477*** (0.106) | 0.476*** (0.106) | 0.691*** (0.0620) |
| Observations | 1,599,885 | 1,599,885 | 1,519,422 | 1,519,422 | 10,040 |

Robust standard errors in parentheses

*** p<0.001, ** p<0.01, * p<0.05

Figure A1: Odds Ratios for the Logit and Conditional Logit Estimating the Likelihood of Notice and Comment Participation



Odds ratios associated with a shift from no loss to the median loss (\$320)

Political Contributions

Table A4: Rulemaking-related Antecedents of Campaign Expenditures: Regression Estimates

| | (1) | (2) | (3) |
|---------------------------------|----------------------|---------------------|----------------------|
| Gains (logged) | -0.016 (0.021) | -0.007 (0.011) | -0.009 (0.005) |
| Losses (logged) | 0.030 (0.023) | 0.025* (0.012) | -0.003 (0.005) |
| Any gain | 0.044 (0.044) | 0.079** (0.029) | -0.003 (0.013) |
| Allowed charges (logged) | 0.030 (0.016) | 0.053*** (0.013) | 0.024*** (0.005) |
| Procedure concentration | 0.042 (0.071) | 0.114* (0.054) | 0.029 (0.022) |
| Specialty salary (logged) | 0.514*** (0.073) | -0.514 (0.288) | -0.443*** (0.044) |
| Constant | -2.862*** (0.402) | 2.642 (1.539) | 2.604*** (0.248) |
| Year effects | Y | Y | Y |
| Specialty \times year effects | N | Y | N |
| Provider effects | N | N | Y |
| Observations | 797,674 | 797,674 | 797,674 |
| R-squared | 0.010 | 0.015 | 0.747 |

Robust standard errors (clustered by specialty-year) in parentheses

*** $p < 0.001$, ** $p < 0.01$, * $p < 0.05$

Table A5: Rulemaking-related Antecedents of Campaign Expenditures: Regression Estimates with Percent to GOP as Dependent Variable

| | (1) | (2) | (3) |
|--------------------------|----------------------|----------------------|----------------------|
| Gains (logged) | -0.001 (0.024) | -0.018* (0.007) | 0.019*** (0.005) |
| Losses (logged) | 0.013 (0.018) | -0.010 (0.005) | 0.032*** (0.005) |
| Any gain | 0.049 (0.030) | 0.040* (0.016) | 0.064*** (0.014) |
| Allowed charges (logged) | 0.020 (0.019) | 0.056*** (0.006) | -0.019** (0.007) |
| Procedure concentration | -0.049 (0.047) | 0.039 (0.026) | -0.000 (0.025) |
| Salary (logged) | 0.239** (0.070) | -1.860*** (0.154) | 0.355*** (0.049) |
| Constant | -1.341*** (0.381) | 10.152*** (0.858) | -1.591*** (0.282) |
| Year effects | Y | Y | Y |
| Specialty×year effects | N | Y | N |
| Provider effects | N | N | Y |
| Observations | 53,210 | 53,210 | 53,210 |
| R-squared | 0.069 | 0.138 | 0.946 |

Robust standard errors (clustered by specialty-year) in parentheses

*** p<0.001, ** p<0.01, * p<0.05

Sensitivity to Alternative Functional Forms

Table A6 estimates the main results from Table A3 on page 6 of the paper using alternative functional forms.

Table A6: Estimating the Likelihood of Notice and Comment Participation with Probit, Firth Logit, and Linear Probability Models

| | (1) | (2) | (3) | (4) | (5) | (6) |
|--------------------------|----------------------|--------------------|-----------------------|---------------------|---------------------|----------------------|
| | Probit | LPM | FirthLogit | Probit | LPM | LPM |
| Gains (logged) | -0.001 (0.092) | -0.000 (0.001) | -0.014 (0.046) | -0.010 (0.027) | 0.000 (0.000) | -0.000* (0.000) |
| Losses (logged) | 0.277*** (0.059) | 0.003* (0.001) | 0.810*** (0.039) | 0.162*** (0.029) | 0.002* (0.001) | 0.002*** (0.000) |
| Any Gain | 0.430* (0.218) | 0.003 (0.002) | 1.299*** (0.144) | 0.356** (0.110) | 0.002* (0.001) | 0.003*** (0.000) |
| Allowed charges (logged) | -0.102* (0.048) | -0.001 (0.000) | -0.322*** (0.023) | -0.000 (0.027) | -0.000 (0.000) | -0.000*** (0.000) |
| Procedure concentration | -0.409** (0.135) | -0.002 (0.001) | -1.315*** (0.127) | -0.021 (0.067) | 0.000 (0.000) | 0.000 (0.000) |
| Salary (logged) | 1.131*** (0.252) | 0.005* (0.002) | 3.593*** (0.104) | -2.682** (0.816) | -0.009** (0.003) | 0.005*** (0.001) |
| Constant | -8.707*** (1.353) | -0.024* (0.010) | -24.632*** (0.676) | 11.715* (4.609) | 0.046** (0.015) | -0.023*** (0.005) |
| Year Effects | Y | Y | Y | Y | Y | Y |
| Specialty×year effects | N | N | N | Y | Y | N |
| Provider effects | N | N | N | N | N | Y |
| Observations | 1,599,885 | 1,599,885 | 1,599,885 | 1,519,422 | 1,599,885 | 1,599,885 |

Robust standard errors in parentheses

*** p<0.001, ** p<0.01, * p<0.05

Re-estimations of Table A3 with Different Gains and Losses Measures

Table A7: Estimating the Likelihood of Notice and Comment Participation: Logit and Conditional Fixed Effect Logit Estimates with Unlogged Gains and Losses

| | (1) | (2) | (3) | (4) | (5) |
|---------------------------------------|---------------------|---------------------|----------------------|----------------------|----------------------|
| Gains (<i>unlogged</i> in millions) | -4.645 (24.266) | -4.586 (24.133) | 3.899** (1.420) | 3.871** (1.390) | -4.003 (3.770) |
| Losses (<i>unlogged</i> in millions) | 2.704** (0.843) | 2.708** (0.844) | 1.527*** (0.318) | 1.531*** (0.318) | 40.222*** (6.215) |
| Any gain | -1.117** (0.356) | -1.117** (0.356) | -0.412*** (0.105) | -0.412*** (0.105) | -0.786*** (0.066) |
| Allowed charges (logged) | -0.143 (0.111) | -0.144 (0.111) | 0.102 (0.088) | 0.101 (0.088) | -0.115 (0.083) |
| Procedure concentration | -1.087* (0.461) | -1.090* (0.462) | 0.085 (0.192) | 0.082 (0.193) | -0.129 (0.320) |
| Salary (logged) | 3.911*** (0.865) | 3.903*** (0.866) | -6.498* (2.579) | -6.452* (2.587) | 2.842*** (0.669) |
| Any donations/Democrat | | 0.124 (0.146) | | 0.145 (0.176) | |
| Any donations/Republican | | 0.265 (0.147) | | 0.189* (0.080) | |
| Any donations/Split | | 0.354 (0.273) | | 0.237 (0.205) | |
| Year Effects | Y | Y | Y | Y | Y |
| Specialty×year effects | N | N | Y | Y | N |
| Provider effects | N | N | N | N | Y |
| $H_0 : Losses - Gains = 0$ | 7.349 (24.08) | 7.294 (23.94) | -2.372 (1.349) | -2.341 (1.321) | 44.22 (6.945) |
| Observations | 1,599,885 | 1,599,885 | 1,519,422 | 1,519,422 | 10,040 |

Robust standard errors in parentheses

*** $p < 0.001$, ** $p < 0.01$, * $p < 0.05$

Table A8: Estimating the Likelihood of Notice and Comment Participation: Logit and Conditional Fixed Effect Logit Estimates With Percent Change

| | (1) | (2) | (3) | (4) | (5) |
|----------------------------|-----------|-----------|-----------|-----------|-----------|
| Gains (% change) | 0.575* | 0.575* | 0.531 | 0.530 | -0.469 |
| | (0.259) | (0.260) | (0.284) | (0.285) | (0.576) |
| Losses (% change) | 6.416*** | 6.435*** | 3.257*** | 3.260*** | 17.759*** |
| | (0.935) | (0.930) | (0.727) | (0.727) | (1.614) |
| Any gain | -0.910** | -0.909** | -0.281** | -0.281** | -0.424*** |
| | (0.321) | (0.321) | (0.096) | (0.096) | (0.079) |
| Allowed Charges (logged) | -0.140 | -0.141 | 0.114 | 0.113 | -0.112 |
| | (0.110) | (0.110) | (0.086) | (0.086) | (0.084) |
| Procedure Concentration | -1.089* | -1.091* | 0.126 | 0.123 | -0.121 |
| | (0.451) | (0.451) | (0.198) | (0.199) | (0.318) |
| Salary (logged) | 3.899*** | 3.890*** | -6.645** | -6.600** | 2.971*** |
| | (0.830) | (0.830) | (2.546) | (2.554) | (0.678) |
| Any donations/Democrats | | 0.135 | | 0.147 | |
| | | (0.145) | | (0.176) | |
| Any donations/Republicans | | 0.288* | | 0.188* | |
| | | (0.142) | | (0.080) | |
| Any donations/Split | | 0.351 | | 0.229 | |
| | | (0.262) | | (0.204) | |
| Year Effects | Y | Y | Y | Y | Y |
| Specialty×year effects | N | N | Y | Y | N |
| Provider effects | N | N | N | N | Y |
| $H_0 : Losses - Gains = 0$ | 5.841 | 5.860 | 2.726 | 2.730 | 18.23 |
| | (0.955) | (0.950) | (0.754) | (0.754) | (1.708) |
| Observations | 1,599,885 | 1,599,885 | 1,519,422 | 1,519,422 | 10,040 |

Robust standard errors in parentheses

*** p<0.001, ** p<0.01, * p<0.05

Specialty Association Lobbying and Participation

Table A9 shows the effects of specialty association lobbying on the propensity of specialty associations to comment on PFS rulemaking. Specifications (1) and (2) assess the determinants of commenting behavior by year. Specification (1) shows the naive regression of commenting on lobbying expenditure while (2) contains the covariates used above.

Table A9: Specialty Association Lobbying and Commenting

| | (1) | (2) |
|------------------------------|-------------------|-------------------|
| Spec. Soc. Lobbying (logged) | -0.283 (0.575) | -0.564 (0.974) |
| Gains (logged) | | -0.134 (1.274) |
| Losses (logged) | | -0.479 (1.755) |
| Any gain | | -4.000 (8.221) |
| Allowed charges (logged) | | -4.399 (6.159) |
| Procedure concentration | | 2.140 (28.956) |
| Observations | 124 | 124 |
| Year effects | Y | Y |
| Provider effects | Y | Y |
| H_0 :Losses-Gains=0 | | -0.344 (1.425) |

Robust standard errors in parentheses

*** p<0.001, ** p<0.01, * p<0.05

Specialty Associations and Mass Commenting in CMS Rulemaking

Rules that receive thousands of comments are often the subjects of mass commenting campaigns. The literature on these campaigns is sparse, making it difficult to assess whether mass commenting behavior on the physician fee schedules is unusual. Anecdotally, the vast majority of comments on some rules that receive hundreds of comments are part of campaigns. For example, in the Security and Exchange Commission’s rule on disclosure of conflict minerals, 99% (39,100 out of 39,500) were from 11 mass comment letters.²

To assess the extent of mass commenting behavior we identify mass comments using the Jaccard distance between each of the comments.³ If two comments are at least 95% similar, we identify them as being part of a mass commenting campaign. That is, the comments must be substantially similar for us to identify them as being part of a mass commenting campaign. We define a “mass comment” as a comment that is substantially similar to at least 99 other physician comments. We show a summary of mass commenting campaigns in Table A10. In the data for this paper there are 18,092 total comments, of these 4,271 come from mass commenting campaigns. Of the 3,273 unique doctors in our database, we classified 910 as submitting comments in a mass commenting campaign.

Mass commenting campaigns by specialty organizations reduce the cost of participation by giving potential participants suggested comment text and requiring only that they go to regulations.gov, paste the text, and add their names to the end of the comment.

Table A11 contains regressions that assess the efficacy of specialty societies in convincing providers to submit comments on proposed fee schedule revisions. In all specifications, the participation of a specialty society, defined as whether a specialty society commented in that

²See the Conflict Mineral Rule on the SEC’s website.

³We experimented with the walktrap algorithm and k-means clustering but found that Jaccard similarity provided the most coherent picture of the mass comment community because it had no preset number of communities.

year, is associated with increases in commenting behavior. In specification (1), for example, a specialty society commenting increases the odds of commenting 11.7 times. Specifications (3a) and (4a) show that specialty society comments increase the rate of commenting in “mass” comment campaigns. Specifications (3b) and (4b) show that the same holds for “tailored” comments. Hypothesis tests show that the differences between these coefficients are not statistically significant, nor are the differences between the negative stakes coefficients.

Table A10: Mass Commenting Campaigns

| Specialty | Medicare Reimbursed Drs | Year |
|-------------------------------|-------------------------|------|
| None | 0 | 2012 |
| Pathology | 114 | 2013 |
| Gastroenterology | 151 | 2013 |
| Anesthesiology | 245 | 2013 |
| Radiology | 113 | 2013 |
| Anesthesiology | 287 | 2015 |
| Totals | | |
| Total Comments | 17,627 | |
| Mass Comments | 4,271 | |
| Mass Comments from Physicians | 910 | |

Table A11: Estimating the Likelihood of Individual and Specialty Society Participation in Notice and Comment Rulemaking

| | (1) | (2) | (3a) | (3b) | (4a) | (4b) |
|---------------------------|----------------------|---------------------|----------------------|---------------------|---------------------|----------------------|
| | Logit | Logit | Multinom. Logit | Multinom. Logit | Multinom. Logit | Multinom. Logit |
| Spec. Soc. comment | 2.459*** (0.528) | 1.970*** (0.540) | 2.318** (0.808) | 2.519*** (0.529) | 1.829** (0.631) | 2.182*** (0.460) |
| Gains (logged) | -0.008 (0.322) | -0.011 (0.164) | 0.005 (0.364) | 0.020 (0.273) | -0.065 (0.204) | 0.063 (0.180) |
| Gains x Spec. Soc. cmt | 0.347 (0.379) | 0.095 (0.222) | 0.473 (0.379) | 0.231 (0.199) | 0.165 (0.204) | 0.021 (0.193) |
| Losses (logged) | 0.812*** (0.181) | 0.618*** (0.160) | 0.920*** (0.198) | 0.743*** (0.173) | 0.693*** (0.143) | 0.566*** (0.111) |
| Losses x Spec. Soc. cmt | -0.212 (0.142) | -0.234 (0.121) | -0.042 (0.171) | -0.284 (0.162) | -0.302 (0.169) | -0.227** (0.087) |
| Any gain | 1.321 (0.835) | 0.967* (0.448) | 1.643 (0.938) | 1.003* (0.463) | 1.249*** (0.376) | 0.642* (0.304) |
| Any gain x Spec. Soc. cmt | -1.307 (1.080) | -0.591 (0.647) | -1.261 (1.247) | -1.087 (0.719) | -0.955 (0.896) | -0.342 (0.552) |
| Allowed charges (logged) | -0.321* (0.148) | -0.059 (0.101) | -0.482* (0.198) | -0.220 (0.112) | -0.127 (0.134) | -0.016 (0.073) |
| Procedure concentration | -1.247*** (0.373) | -0.223 (0.191) | -1.748*** (0.374) | -0.967* (0.471) | -0.802** (0.278) | 0.166 (0.180) |
| Salary (logged) | 4.086*** (0.754) | -3.323 (1.879) | 5.508*** (1.089) | 3.391*** (0.713) | 2.649*** (0.748) | -6.876*** (2.025) |
| Year Effects | Y | Y | Y | Y | Y | Y |
| Provider effects | N | Y | N | N | Y | Y |
| Observations | 1,599,885 | 1,594,789 | 1,599,885 | 1,599,885 | 1,599,885 | 1,599,885 |
| H_0 : Neg. stakes equal | | | 0.277 (0.119) | | 0.127 (0.095) | |
| H_0 : Spec. cmt. equal | | | -0.202 (0.541) | | -0.202 (0.454) | |

Robust standard errors in parentheses

*** $p < 0.001$, ** $p < 0.01$, * $p < 0.05$

Columns (1) and (2) of this table are from logistic regressions where the dependent variable is whether or not a provider commented on a regulation. Columns (3) and (4) are from multinomial logistic regressions where the base category is no comment. The coefficients in Columns (3a) and (4a) are the multinomial log-odds of a mass comment compared to no comment at all. Columns (3b) and (4b) show the multinomial log-odds of a custom comment in comparison to no comment. The negative stakes hypothesis test at the bottom of the table shows a coefficient and a standard error for a test comparing the difference between the coefficients of logged losses in columns (3a) and (3b) and (4a) and (4b), respectively. The specialty comment line below is the same test for the coefficients on specialty association comments.