"Kai M. A. Chan" <kaichan@stanford.edu>
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To: Mabel E. Echols OMB_Peer_Review/OMB/EOP@EOP

cc:
Subject: proposed Bulletin for peer review

Joshua B. Bolten, Director, Office of Management and Budget,
725 17th Street, N.W., NEOB Room 10201, Washington, DC
20503

Dear Dr. Bolten,

I write to you as a conservation biologist at Stanford University regarding
the proposed Bulletin "Peer Review and Information Quality".

As a scientist who has published several papers in peer-reviewed journals, I
know how important the peer-review process can be. It can significantly
improve the polish and quality of resulting publications. However, as a
reviewer, I also know that the peer-review process is a costly and time
consuming one. This is especially true when the item in review is not a
finished piece of work--an article or report--but merely data, findings, or
analyses.

Because of these major disadvantages of the process, the Bulletin will not
only incur great costs, it will significantly slow the regulatory process.
The research coming out of federal agencies is for the most part very high
quality work. While their reports and publications should certainly be
reviewed by independent peers, this is an inappropriate standard for data
and analyses.

In addition to these concerns, there is one provision in particular that
troubles me: the provision that excludes agency scientists from peer
reviewing other work, but which allows industry scientists from regulated
parties to serve as reviewers. Such a provision avoids one possible
conflict of interest while clearly missing a much more significant conflict
of interest.

Sincerely,
Kai

Kai M. A. Chan   Center for Conservation Biology
750 N. Shoreline Blvd., #152   Department of Biological Sciences
Mountain View, CA   94043   Stanford University
USA   Stanford, CA 94305-5020

650.969.3515   650.725.1783
fax 650.723.5920
kc@kchan.org   kaichan@stanford.edu
www.kchan.org

"There are no passengers on spaceship Earth. We are all crew." - Marshall
McLuhan