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12/13/2003 04:51:45 PM

Record Type: Record

To: Mabel E. Echols OMB_Peer_Review/OMB/EOP@EOP
cc: "Caroline L. Herzenberg" <carol@herzenberg.net>
Subject: Peer Review and Information Quality proposal

13 December 2003

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

Dear Mr. Bolton:

I am writing to you in regard to the Office of Management and Budgets Peer Review and Information Quality proposal, which I find deficient, and which I as a scientist am asking you to withdraw.

While peer review serves a vital function in science, it would appear that in this particular application peer review would lead mainly to delays in regulatory actions rather than contribute to improvements in scientific and technical understanding.

The proposal seems to exempt a large proportion of regulatory documents for which the science originates from a regulated industry, which in my opinion would be the very documents in most need of peer review.

I find it very disturbing that the proposals conflict of interest requirements would apparently preclude the participation of academic scientists whose work is supported by federal funding, but not exclude industry scientists who work for regulated corporations.

There are numerous other drawbacks, but I believe these suffice to make my point.

In summary, the proposed OMB Bulletin Peer Review and Information Quality seems to be fundamentally flawed in its intent as well as in its content. It would appear that implementation in its present form would entail substantial costs and be of little if any value, and likely have negative impacts on public health and the environment.

As a scientist I find myself opposed to the Peer Review and Information Quality Bulletin in its present form, and I am asking you to withdraw it, and open up a discussion with the whole scientific community as to how to achieve the desired results without the unfortunate drawbacks that are present in this document.

Sincerely yours,

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