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To: Margo Schwab <OMB_peer_review@omb.eop.gov>

cc:

Subject: Extend Public Comment Deadline for Peer Review Bulletin

Peter Suber
Open Access Project Director
Public Knowledge
80 Judy Point Lane
Brooksville, ME 04617

May 19, 2004

Margo Schwab
NEOB Room 10201
725 17th Street, NW
Washington, DC 20503

Dear Schwab:

I am writing to urge the Office of Management and Budget (OMB) to engage in a more deliberative and proper evaluation process for the revised peer review policy. The development of the first ever government-wide set of requirements for scientific peer review should not be rushed.

OMB should immediately extend the 30-day public comment period to 90 days so that interested parties, such as busy university scientists and health organizations, can fully consider the proposal's substantive changes.

I also urge OMB to initiate a 120-day inter-agency review process for the revised proposal. This bulletin will significantly affect the operations of agencies and it is important to ensure that their concerns and questions are adequately addressed during this process. Given the proposal's substantial revision, it is vital that OMB re-engage the agencies in determining the impacts of the revised proposal on the regulatory process.

During the original policy proposal, OMB recognized the importance of both public comments and agencies' input by opening lengthy review periods for both. Especially given the significant changes to the new revised bulletin, please do not weaken the involvement of the public and agencies during this critical consideration.

Thank you.

Sincerely,

Peter Suber
Open Access Project Director
Public Knowledge