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To: Mabel E. Echols OMB\_Peer\_Review/OMB/EOP

cc:

Subject: Peer review comments

- OMB peer review comments.doc

October 13, 2003

Office of Information and Regulatory Affairs  
Office of Management and Budget  
Dr. Margo Schwab  
725 17<sup>th</sup> Street, NW  
New Executive Office Building, Room 10201  
Washington, DC 20503

RE: Proposed Peer Review Standards for Regulatory Science

Dear Dr. Schwab:

The American Loggers Council offers the following comments on your proposed "Peer Review Standards for Regulatory Science:"

1. The objective should include "the science used to support regulatory action is of a quality that would allow its publication in a reputable journal." This would allow for the "transparency" that you refer to in your document.
2. In Section 2, first paragraph, the word "credible" should be added before "scientific journal may generally be presumed to be adequate." Again, this would allow for the transparency that you seek in promoting the quality of the science and take away the perception of bias in the scientific study.
3. In Section 3, under the section on Selection of Peer Reviewers, we suggest that you include both "blind" and "hostile" peer review. The addition of these terms would help to create anonymity of the author without the peer reviewers knowing his/her identity, leading to greater objectivity, while a "hostile" peer review would lead to disclosure of problems that could become contentious in nature further in the project.
4. Accountability. The proposed standards need to address the concerns of responsibility and penalties for the agencies implementing and possibly violating the peer review policy. Violations of the policy need to be able to identify the person and/or position that will be held accountable for the violations as well as penalties for those violations.

The American Loggers Council has supported the use of a "blind, hostile peer review" process for many years, but without accountability by the agencies, the proposed guidelines would be of little use. We appreciate the opportunity to comment on this important issue.

Respectfully submitted by,

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