"Kahn Desmond (DNREC)" <Desmond.Kahn@state.de.us> 12/12/2003 09:09:13 AM

Record Type: Record

To: Mabel E. Echols OMB_Peer_Review/OMB/EOP@EOP

cc: SSI Mailbox <SSI@ucsusa.org>

Subject: Proposal for scientific peer review

I want to register my comments on the proposed revision by the Office of Management and Budget of the regulations regarding scientific peer review. These proposals are extremely onerous and appear, on their face, to be designed to impede government scientific work and scientific regulation. I work for a state agency and am a fisheries biologist. If subjected to the proposed requirements, productivity and our work, in general would become mired. There are many aspects of this which are counterproductive. Prohibiting use of scientists with government research contracts while allowing the use of industry scientists is only one example of the way this proposal would tilt the field away from protection of the public and away from the protection of our environment. As a whole, the proposal is an outrage. I request you withdraw this proposal and develop a open process of consideration of this issue using the National Academy of the Sciences as the appropriate venue.