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

CC

Subject: Peer Review and Information Quality

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

Dear Director Bolton,

In multiple ways the "Peer Review and Information Quality" proposal is seriously flawed in its attempt to appropriately evaluate scientific research. The Science, Technology, and Law Panel of the National Academy of Sciences (NAS) held a workshop on the proposal on November 18, 2003 and found the problems with this proposal so numerous as to defy straightening out. They concluded the proposed OMB Bulletin "Peer Review and Information Quality" is fundamentally defective in its intent as well as its content. They further agreed that implementation in its current form will serve little value, its costs will be substantial, and its benefit to the public's health and environment will likely be negative.

For these particularly substantive reasons, I strongly oppose this proposal and I ask the Office of Management and Budget to withdraw the proposed Bulletin and engage the scientific community in an open, transparent process.

Sincerely,

Judith M. Misale, Ph.D