## robert eplee <eplee@weblnk.net> 12/13/2003 07:08:04 PM

Record Type: Record

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

CC:

Subject: Fwd: Peer Review and Information Quality proposal.

>Joshua Bolten, Director, OMB

>It has been brought to my attention that OMB is considering implementing >changes that require extensive time, effort and cost associated with a >process of peer review of activities associated with data and findings >associated with regulations. My question is WHY?. Change does not >necessarily equate to improvement.

>As a federal employee for 42 years, trying to protect agricultural, >managed and natural ecosystems from alien and invasive species of living >organisms from being introduced into the USA I certainly see the need for >quality inputs into regulation. But by experience as a scientist was that >good science was often manipulated or ignored by bureaucrats who were >looking out for their own, or some special interest group's interest >rather than public welfare.

>It is my request that those in OMB who have the desire to improve our >regulatory system pursue a procedure whereby science is by scientists who >provide information to orchestrate bureaucratic activity., rather than >bureaucrats attempting to dictate scientific procedure. I rarely met a >bureaucrat that exercised expertise in orchastrating scientific activities.

>The bottom line!. Let science and technology do their thing and let >bureaucrats do theirs. We need both, but we do not need a perpetual and >unnecessary cat and dog fight. Please do not push forward with the >proposed rule on "peer Review and Information Quality" until it is >constructive to inhansing public welfare. "No progress is better than bad >progress"

Robert E. Eplee, Ph.D. USDA, APHIS Retired.

Outgoing mail is certified Virus Free. Checked by AVG anti-virus system (http://www.grisoft.com). Version: 6.0.518 / Virus Database: 316 - Release Date: 9/11/2003