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

cc:

Subject: Comments on AAAS letter of 12/03/03

Dr. Margo Schwab
Office of Information and Regulatory Affairs
Office of Management and Budget
725 Seventeenth Street N.W.

Dr. Schwab:

I have just read the letter sent to your office by AAAS officers Floyd E. Bloom and Alan I. Leshner. The letter is published on the aaas.org web site. Perhaps you would like to hear another view on peer review, from one who has seen the darker side of it.

Between October 1991 and March 1994, I worked as a research associate at CIRA, the Cooperative Institute for Research in the Atmosphere, at Colorado State University in Fort Collins Colorado. I analyzed atmospheric aerosol data from the federally funded IMPROVE network, under William C. Malm of the National Park Service. I and the other research associates were encouraged to investigate any idea that promised a fuller understanding of the IMPROVE data, and how it could enlighten the research of others in the field of aerosol research around the world. We were expected to write and publish papers in peer-reviewed journals on a regular basis.

While seeking to learn the source of nagging uncertainties and doubts about some of the aerosol measurements performed in the IMPROVE protocol, I found that, although I had followed up on paths previously recognized by Dr. Malm, he and his colleagues were not open to my findings and were set in contrary views that were opposed to the evidence; for example, he tended to emphasize forest fires as the major visibility pollutant, while my analyses--and as I learned, the research of others in this field of study--indicated black carbon, largely from diesel fuel use, was a major, and largely unrecognized factor. When I wanted to publish my work, Dr. Malm threatened my job, and said he would determine what papers could be published by people in his group, from analyzing the IMPROVE data. Knowing the importance of my work--it agreed with the scattered reports of others around the world, but seemed to be denied by a major faction of principle researchers--I persisted, and in March 1994 my position was terminated, due to "funding cuts" (although others were being hired to fill my position even as I was leaving).

This is not a tirade against IMPROVE or Dr. Malm, or even CIRA, who let me be terminated improperly; it is about the roots of abuse in peer review. I had already submitted my papers when I was terminated, and I fought for two years to get them published, which I finally did, in January 1996. During that two years, I did not see even one competent scientific critique of my work, merely repeated, unsupported assertions by nameless people who obviously felt they did not have to address the evidence, but only the current "consensus" or, more insidiously, their own interpretations, which were frequently irrelevant, often incompetent, and entirely opposed to open and honest debate. In short, I found that the suppressive character of my immediate superior's views and actions were just the tip of an iceberg, an iceberg of widespread lack of sure knowledge about aerosol measurement problems and common standards for evaluating them, not to mention prejudices and blind spots against recognizing the real explanations for the many nagging problems and endless debates that marked the aerosol field. The peer review system, when it is a system akin to that of independent feudal lords or warring tribal chiefs, is simply an empty process that guarantees no one will ever learn anything, until someone gets to be a chief who will put truth above his own self-interest. When I read the comment from the AAAS that reviewers should not be identified, I knew the authors of that letter were incompetent to advise you on such an important matter, and I had to write this.

Thank you for your consideration,

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