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To: Mabel E. Echols OMB\_Peer\_Review/OMB/EOP@EOP  
cc:  
Subject: Comments to "Peer Review and Information Quality" Proposal

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

Dear Mr. Bolten:

I am writing as a concerned citizen and a research biologist in regards to The Office of Management and Budget's proposed "Peer Review and Information Quality" Bulletin.

What evidence is there that the current regulatory system is not working? In a recent National Academy of Sciences workshop many speakers pointed out that not a single example has been raised demonstrating inappropriate or flawed federal regulations being promulgated as a result of failure to peer review.

Has the OMB performed a cost-benefit analyses in government regulations or an assessment of the costs of the proposed Bulletin in terms either of diversion of agency resources or delayed regulatory protection?

If academic scientists whose work is supported by federal funding are eliminated with the "conflict of interest" requirement, so should industry scientists be eliminated.

In closing, recognizing that peer review of science in the regulatory context is an important process, the scientific community should be engaged in this discussion. The National Academy of Sciences is an appropriate forum for such a discussion. The Academy has issued several important reports on agency peer review, as well as on broader issues relating to the role of science in regulation. The OMB should withdraw the proposed Bulletin and engage the scientific community in an open, transparent process.

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