

September 26, 2003

Michael J. Holland  
Office of Science & Technology Policy  
1650 Pennsylvania Ave, NW  
Washington, DC 20502

Dear Mr. Holland:

I am writing this letter on behalf of the Association of Independent Research Institutes (AIRI) in response to the request from the Office of Science and Technology Policy for information regarding research business models.

AIRI is a nationwide association of 89 non-profit independent research institutes that conduct biomedical and behavioral sciences research. AIRI institutions are distinct from other organizations involved in research, such as universities, hospitals, and for-profit laboratories, in their organization, mission, and size. Their flexibility provides an environment that is particularly conducive to creativity and innovation in research. Independent research institutes compete successfully for peer reviewed research grants, receiving 11 percent of the extramural funds awarded by the National Institutes of Health. Other funding sources include the National Science Foundation, the Department of Energy, the Department of Defense, the Department of Agriculture, the Centers for Diseases Control and Prevention, and the Department of Education.

AIRI supports the efforts of the National Science and Technology Council's Subcommittee on Research Business Models as it begins its review of policies, procedures and plans related to the business relationship between federal agencies and research performers. AIRI applauds the goal of improving the performance and management of federally sponsored scientific and engineering research and looks forward to the upcoming set of workshops being planned by the Council in the fall of 2003.

AIRI believes it is vitally important to keep in mind some important principles regarding this Nation's research enterprise. Any policy changes that could affect the output of the research enterprise must be carefully considered so as to not have unintended adverse consequences on the productivity and

diversity of the Nation's research enterprise. The taxpayer should expect federally supported research to contribute to the improvement of the quality of the Nation's health, environment, economic and national security. For the enterprise to make these contributions, it must be well supported financially on a continuing basis. The system must be flexible, competitive, responsive and supportive of the individual investigator, with decisions based on merit, and the financial investment must be diverse in terms of the fields supported and the modes of support utilized. Finally, the process must be open and receptive to new ideas and investigators from all research institutions – regardless of size.

It is AIRI's view that scientific research -- if supported and managed with these principles in mind -- will not only be self-correcting, but also represents the best way to create and develop the valuable new knowledge needed for true scientific advancement and its ultimate application.

AIRI appreciates the opportunity to make these comments and looks forward to the work of the Council's subcommittee.

Sincerely,

Randall C. Main  
President  
AIRI