

Gentlemen: On behalf of the University of Pittsburgh, I wish to endorse the comments submitted by the Council on Governmental Relations (COGR) and the Association of American Universities (AAU) in response to the request for information on research business models from the National Science and Technology Council as published in the August 6, 2003 *Federal Register* (68 FR 46631).

In general, we believe that there has been a valuable and longstanding partnership between academic institutions and the federal government which has produced significant benefits, including the generation of new knowledge and discoveries that have improved human health, helped secure the nation, and created jobs and economic growth. However, we are concerned with the language in the NSTC request for information as the term "research business model" has not been defined. Academic research funded by the federal government does not conform to more traditional definitions of "business" and we firmly believe that conventional "business" processes and terminology should not and cannot be reliably and appropriately applied to the academic context.

In our review of the research university/federal government partnership, we suggest that:

- Universities are significantly engaged in accountability through accreditation and reporting;
- Consistent agency practices among all agencies funding extramural research would be an improvement and quite helpful;
- Regulatory requirements are increasing, without commensurate reimbursement, as indicated in the 2000 report from RAND, necessitating improvements in cost recovery;
- The government should continue to support basic research as well as applied and even high-risk research;
- Longer and larger grants would be more efficient since investigators would be able to spend more time on research and less time on proposal writing; and
- Even in tight financial times that additional funding be found to improve and increase the research infrastructure to remedy deficiencies.

We appreciate the efforts of the NSTC and its subcommittees to examine the nature of the university/government research partnership, but believe that additional dialogue is still required.

Jeanne Stoner, Esq.
Director, Federal Government Relations
University of Pittsburgh
710 Alumni Hall
4227 Fifth Avenue
Pittsburgh, PA 15260
Phone: 412 624-6011
Email: jcstoner@pitt.edu