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

cc:

Subject:

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

Dear Director Bolten:

The proposed OMB Bulletin "Peer Review and Information Quality" is fundamentally flawed in its intent as well as content. Implementation in its current form would serve little value; its costs will be substantial, and its benefit, at least to the public's health and environment, will likely be negative.

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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