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

cc:

Subject: Peer Review Bulletin proposal

Joshua B. Bolten
Director, Office of Management and Budget
725 17th Street, N.W.
NEOB Rm 10201
WashingtonDC20503

Re: Peer Review and Information Quality Bulletin proposal

Dear Mr. Bolten:

I urge OMB to withdraw the proposed Bulletin and engage the National Academy of Sciences and other scientific organizations and scientists in an open discussion on this important matter.

My scientific qualifications, briefly stated, are as follows. I am a Professor Emeritus of Statistics, Geology and Geography at the University of Delaware and am an elected fellow of the American Statistical Association. I have been engaged in research in earth and environmental sciences for the past 30 years. I am an online faculty member, University of Phoenix and am president of Southwest Statistical Consulting, LLC. I have served as a technical scientific reviewer for numerous governmental and professional organizations.

My major concerns with the proposed Bulletin are as follows:

1. The present review system works. I see no evidence to the contrary. If there is evidence, OMB should carefully document it.
2. The proposal severely limits the number of qualified reviewers. Most qualified academic scientists receive federal funds. **The only reviewers left would be those from industry who often have a direct conflict of interest.** I think this is the most serious flaw with your proposal.
3. Foreign affairs and national defense should not be exempted from the peer review process.
4. The proposed process would be costly, cumbersome, cause unnecessary delays.
5. Confidence in findings would be diminished. Decision makers and the general public would not be assured that they were receiving the best, unbiased scientific information.

Thus, I again strongly urge you to withdraw this proposal.

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