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

cc:

Subject: Peer Review and Information Quality Bulletin

Dear Director Joshua B. Bolten,

I am writing to request that the Office of Management and Budget withdraw the proposed Bulletin on Peer Review. Instead, I feel you should engage the scientific community in a discussion of the need and structure of peer review in regulatory science. The National Academies of Science would be an excellent place to start.

Some of my reasons for opposing this Bulletin are as follows:

1) I'm not sure that there is anything wrong with the current system, yet the new proposed system is sure to lead to delays and increased costs (unfunded ones). I find it hypocritical that OMB touts the need for cost-benefit analyses in government regulations, yet in this instance you have done no assessment of the costs of the proposed Bulletin in terms either of diversion of agency resources or delayed regulatory protection.

2) You will find it difficult to entice sufficient independent, knowledgeable peer-reviewers to review the large numbers of documents. Most documents will contain no new science, which will make them "boring" for potential reviewers. Furthermore, this new demand for peer reviewers will negatively impact the many organizations that have already strained peer review systems.

3) It disturbs me that academic scientists appear to be precluded from being reviewers if they receive federal funding. This leaves a good deal of the reviewing to industry scientists who work for regulated parties. The net result, I feel, would slant regulations away from best protecting public health and the environment.

Please drop this Bulletin, and bring a broad range of the nation's scientists into a discussion of what type of peer review process would work best. Thank you.

Sincerely,
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