

"Ronn G. Smith" <lrsmith@fiberpipe.net>
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Please respond to "Ronn G. Smith" <lrsmith@fiberpipe.net>

Record Type: Record

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

cc:

Subject: Peer Review and Information Quality Proposal

Dear Mr. Bolten:

I am writing to encourage withdrawal of the proposed OMB requirement for peer reviewed science to support regulatory policy decisions. I urge OMB to consult the scientific community to come up with a more acceptable plan. I am a licensed engineer with a degree in Physics, and currently chair the Wyoming Air Quality Advisory Board. I am all in favor of peer reviewed science, but have the following concerns about this proposal:

1. The Bulletin appears to allow reviews by industry-paid scientists, but not by government-funded researchers. This reduces and biases the pool of potential reviewers, supporting the suspicion that the initiative is designed to impede sound regulation.
2. Since a case has not been made against the current system, I am again suspicious of the motives. Peer review procedures are already incorporated by regulatory agencies (I am most familiar with EPA). In addition, the requirements for public comment allows any scientific authority (including the regulated community) access to the rule making process.
3. This initiative could raise the barrier to incorporating scientific judgment in the regulations. If too high, this barrier could lead to deficient public policy.
4. I have not seen evidence that OMB is better equipped than the regulatory agencies to make the final call on policy issues. The proper way for the executive branch to address problems, if they exist, is through those agencies.

Thank you for your consideration.

Sincerely,

Ronn G. Smith, P.E.
Sheridan, Wyoming