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To: Mabel E. Echols OMB_Peer_Review/OMB/EOP@EOP
cc:
Subject: Peer Review; Information Quality Proposal

The Office of Management and Budget should withdraw this very faulty proposed Bulletin. Our leading scientists should be consulted, and their advice followed in any such new regulatory move.

The system we have now functions well, even though it is not perfect. We need more evidence of a need for specific changes.

The authors of the OMB have not shown precisely where changes need to be made, nor what clear advantage such changes would have.

The OMB Bulletin contains many confusing points. I think that if the proposal were implemented, it would bring about increased costs and delays that would in turn be harmful and cause additional unforeseen costs.

The nation does not have adequate peer-review resources now, and additional loads would result in inferior results, delays, and hazards.

The proposal's conflict of interest requirements seem to preclude the participation of our most able academic scientists who work with federal funding, while at the same time not excluding industry scientists who work for regulated parties. This is a very serious conflict, and permits regulated industry to choose scientists who may not have the knowledge and experience necessary to competently choose a correct course.

The OMB is not sufficiently open to scientific appraisal to prevent religious and commercial interests from secretly influencing decisions if the intent of the proposal is followed.

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