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

cc:

Subject: Peer Review and Information Quality

Dear Mr. Bolten,

I would like to comment on the provision in OMB's draft bulletin, "Peer Review and Information Quality", regarding the composition of peer review panels for analysis of proposed federal regulatory policies. I have extensive experience with the peer review process, having reviewed grant proposals for the National Science Foundation, Sea Grant, the National Undersea Research Program, and various other funding agencies, as well as having reviewed many manuscripts submitted for publication in scientific journals. I have also served for 10 years as a panel reviewer for the Environmental Protection Agency. I am fully committed to legitimate peer review practices as appropriate.

However, I understand that OMB's proposal with regard to its "peer review" panels would include provisions excluding federally funded academic scientists from participation while allowing participation by "scientists" from for-profit entities with a stake in review of proposed regulatory policies. This is an outright Orwellian idea, having the foxes guard the hen house while excluding the most objective and well qualified professionals. This is a recipe for bad government and bad policy. It's a bad idea and must be stopped.

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