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12/13/2003 10:55:26 PM

Record Type: Record

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

cc:

Subject: Proposed OMB Bulletin "Peer Review and Information Quality"

Dear Mr. Bolten, Director, Office of Management and Budget(OMB):

I am writing to urge you to withdraw the proposed subject Bulletin and engage the scientific community in an open and transparent process. This bulletin will affect the governments use of science in regulation. I find the proposed bulletin particularly disturbing because it appears to remove academic scientists (whose work is supported by federal funding) from the peer review process while allowing industrial scientists to be reviewers. The academic scientists are precisely the ones that should be reviewing such regulations, while industrial scientists can easily be pressured by their employers. I am quite aware of this pressure since I worked as a research chemist for 30 years. I witnessed my fellow chemists, engineers, and managers making bad judgments and even changing data for fear of losing their jobs and this from a company which generally was quite fair.

Sadly I fear that this is one more attempt by the Bush Administration to make an end run around good science in order to make ideological decisions without the messiness of having to deal with facts. This view is bolstered by my suspicion that the object of these regulations is really to hamper environmental and public health protection. It seems strange to me that authority for scientific peer review would be centralized in the OMB which has few scientists and whose workings are particularly opaque.

While I am aware that the present system of peer review in science can make mistakes, It is undoubtedly the major reason why science has kept a high standard of integrity for the past 200 or so years. I have had my work peer reviewed and have also peer reviewed many papers. I have always taken it quite seriously when being both the reviewer and the reviewee, and I have generally been pleased with the outcome. It would be terrible if government regulations were denied this important process. Once again, I urge you to withdraw this Bulletin and engage the scientific community in an open, transparent process.

Sincerely,

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