

Stacy <smcnulty@esf.edu>
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To: Mabel E. Echols OMB_Peer_Review/OMB/EOP@EOP
cc:
Subject: OMB withdrawal of Peer-review Bulletin

December 15, 2003

Joshua B. Bolten
Director, Office of Management and Budget
725 17th Street, N.W.
NEOB Room 10201
Washington, DC 20503

Re: OMB withdrawal of "Peer Review and Information Quality" Bulletin

I am an ecologist for the State University of New York College of Environmental Science and Forestry. I believe that peer review is an important component of scientific research, and, ultimately, in scientific information influencing policy.

However, the Office of Management and Budget should withdraw the proposed "Peer Review and Information Quality" Bulletin and engage the scientific community in an open process to improve the current situation, if that is warranted. Peer review is important, but it will never produce "correct" science - it is critical to remember that! There are many reasons why the proposal should be withdrawn, including:

The Bulletin appears to be written in a way that will prevent peer review participation of academic scientists whose work is supported by federal funding, but will not exclude industry scientists who work for regulated parties. There seems to be a conflict of interest here.

The proposal appears to exempt a large proportion of regulatory documents where the science emanates from the regulated industry, where many would argue the science is in most need of peer review.

Additionally, there is no need for a blanket exemption for national defense issues, as a case-by-case national security exemption policy could handle any security-sensitive issues.

Please withdraw the Bulletin and engage the scientific community in an open process about this important issue. Until these serious questions and issues are made clearer by OMB and greater participation by scientists at all levels occurs, I am concerned that this Bulletin may lead us to scientific "gridlock," resulting in the failure to act on new research.

Sincerely,

Stacy McNulty
Adirondack Ecological Center
SUNY Environmental Science and Forestry
6312 Rt. 28N
Newcomb, NY 12852
518-582-4551 voice

518-582-2181 fax
smcnulty@esf.edu
<http://www.esf.edu/aec>