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Brooke Dickson  
Office of Information and Regulatory Affairs  
Office of Management and Budget  
Washington, D.C. 20503

Dear Ms. Dickson.

I am writing on behalf of the University of Arizona concerning the Proposed Guidelines for Ensuring and Maximizing the Quality, Utility and Integrity of Information Disseminated by Federal Agencies published in the Federal Register on June 28, 2001. I wish to associate The University of Arizona with the comments provided to you by the presidents of the Association of American Universities and the National Association of State Universities and Land Grant Colleges.

In general, I find that the proposed guidelines are confusing and raise troubling questions that merit serious review. Given that these questions cannot be sufficiently addressed before the September 30 deadline for issuing the guidelines, I would encourage OMB to request that Congress extend the deadline.

The requirement of new, duplicative tests before information is released appears contradictory to the goal of transparent government and some federal law. In addition, it would make the release of government information more cumbersome and is redundant of federal laws.

The requirement that agencies must consider whether the information is useful to all users of the information, including the public is particularly troubling. This test could allow parties to impede the release of material to which they object on other non-relevant grounds simply by challenging its usefulness. I share the view that OMB should clarify the notice to ensure that it does not establish procedures that facilitate the harassment of scientists by those who simply dislike the conclusions of their scientific investigations.

I believe it would be inappropriate to include within the scope of the notice academic research supported by federal grants and I strongly oppose the imposition of such requirements that could limit the right of faculty to publish under long-standing academic practices. In addition, I urge deletion of the reference to scientific research information.