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Ms. Brooke Dickson
Office of Information and Regulatory Affairs
Office of Management and Budget
Washington, DC 20503

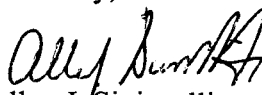
Subject: Proposal Guidelines for Ensuring and Maximizing the Quality, Objectivity, Utility and Integrity of Information Disseminated by Federal Agencies (66 FR 34489)

Dear Ms. Dickson:

Princeton University appreciates the opportunity to comment on the subject guidelines.

Pub.L 106-554. Section 515, requires the Office of Management and Budget (OMB) to prepare policy and guidance to federal agencies for ensuring and maximizing the quality, objectivity, utility and integrity of information (including statistical information disseminated by federal agencies. We support OMB's statement that the agencies should adopt common sense systems that minimize the burden of implementation by relying as much as possible on established agency procedures and processes. However, because research universities generate much of the information that federal agencies distribute, we are concerned with some aspects of the proposed statement. Under the proposed guidelines, some agency dissemination of information arising from research conducted at universities has the potential to be treated in a manner that could be damaging to the government-university research partnership by discouraging the sharing of research information and, therefore, potentially harming the ultimate benefit of the information. We are concerned that guidance about standards of excellence have not been addressed adequately. We urge OMB to state explicitly that the statute cannot be interpreted by agencies to place additional burdens on the scientific community, either directly or by requiring procedures that would result in delays of publication or that would impose a process that would divert funds from research support.

Sincerely,


Allen J. Sinisgalli