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To: Mabel E. Echols OMB_Peer_Review/OMB/EOP@EOP
cc:
Subject: Withdraw OMB Peer Review Bulletin

The OMB should withdraw the proposed Bulletin and engage the scientific community in an open, transparent process.

I have a doctorate in engineering and help manage development of scientific instruments for a small company in upstate NY. The proposed process looks like it can easily be used to impede progress in improving areas covered by the EPA, DOE, CDC and FDA.

There is no evidence that the current system is not working. There currently exist many models of scientific peer review in government agencies. The authors of the OMB proposal made no attempt to examine this extensive experience and see what works well (and what doesn't), and on that basis determine if changes are needed.

Although the OMB touts the need for cost-benefit analyses in government regulations, there has in this instance been no assessment of the costs of the proposed Bulletin in terms either of diversion of agency resources or delayed regulatory protection.

The proposal's conflict of interest requirements appear to be written in a way that will preclude the participation of academic scientists whose work is supported by federal funding, but not exclude industry scientists who work for unregulated parties.

It goes even further: 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.

The exclusion of these areas from the peer review proposal suggests that the objective of the proposal is not to improve regulatory science but rather to hamper environmental and public health protection.

Sincerely,

Bill Rogers
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