

SquidBro@aol.com  
12/15/2003 04:46:56 PM

Record Type: Record

To: Mabel E. Echols OMB\_Peer\_Review/OMB/EOP@EOP  
cc: SquidBro@aol.com  
Subject: proposed OMB peer review bulletin

Dear Mr. Bolten

I am writing to you to comment on OMB's proposed peer review bulletin. I am an accomplished fishery scientist who is very familiar with peer review standards and practice.

My primary comment is that the proposed bulletin is not necessary. When reading the description of the justification for this action(pp. 2-3), I found no evidence that peer review conducted by federal agencies had led to any inappropriate regulatory action. This bulletin is a "solution" to a non-existent problem. A practical solution to the need for ongoing peer review would be to analyze the evidence of what works and does not work - this is the scientific method. If OMB cannot identify significant and substantial regulatory problems caused by a lack of appropriate peer review, then why is it proposing this action?

Other problems with the proposed bulletin:

The proposed bulletin would substantially increase the cost of peer review for regulatory agencies. It would also increase paperwork and encourage inefficiency in the regulatory process.

The proposed bulletin does not clearly define all conditions under which additional peer review would be required.

OMB does not have the relevant expertise to ensure that peer review required by this bulletin would meet existing scientific standards. In particular, centralizing the authority for regulatory peer review within OMB is not appropriate. Individual agencies are the best means to ensure the integrity of their own regulatory science using their peer review standards.

It is not clear who is responsible for granting exemptions to peer review. It is also not appropriate to exclude academics who receive funding from the federal government from peer review process suggested in the bulletin.

Exempting the department of defense and industry scientists from the bulletin's requirements is not appropriate.

Given these problems with the proposed bulletin,  
it is my recommendation that you withdraw it.

Thank you for your consideration.

Sincerely yours,  
Jon Brodziak, Ph.D.