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August 13, 2001

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

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

Dear Ms. Dickson:

I am writing to echo the concerns of the University of California about the new guidelines published in the Federal Register on June 28, 2001. While applauding Congress's interests in the area of the quality of data and information disseminated by federal agencies, I concur that the proposed guidelines go beyond the statutory mandate of P.L. 106-554 in highlighting the application of these guidelines to scientific information.

I advocate, along with others at the University, deletion of paragraph V.B.ii(a) in its entirety. I am also concerned about OMB's silence with respect to the role of the scientific, peer-review process in ensuring the quality of research data disseminated; overly simplistic treatments of the concepts of "reproducibility" and of "underlying data" in the scientific realm; with vague definitions of such concepts as "quality," "utility," "objectivity" and "integrity" as these terms apply to research results; and with the absence of safeguards against improper challenges to agencies' compliance with the guidelines claiming to be "affected parties."

I request that OMB revise its proposed guidance in accordance with the comments of the University of California. Given the short time frame between the date that comments are due to OMB (August 13, 2001) and Congress' mandate to implement guidelines by September 30, 2001, I encourage OMB to request an extension from Congress to the implementation deadline and republish the revised guidance as a draft for comment.

Thank you for this opportunity to comment on these proposed guidelines.

Sincerely,

Roberto Peccei
Vice Chancellor
Research

cc: President Richard Atkinson
Provost Judson King
Vice President Scott Sudduth
Director Allison Rosenberg
Director Ann Pollack