I am a biologist in higher education, and routinely conduct research funded by federal agencies (current funding by US Dept. of Energy).

I urge OMB to withdraw the proposed bulletin. There is no strong evidence that the current system is not working properly. Moreover, the new system would not work well as it fails to properly engage the scientific community. For example, the provision that scientists who are federally funded or intent to seek future funding cannot serve as independent reviewers would exclude virtually all top researchers at US universities. A tremendous waste of talent. Also, many provisions would cause unnecessary delays in actions by regulatory agencies.

Sincerely;

Dr. Paul Klerks

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