January 31, 2011

Joan Stanley
National Coordination Office
Networking and Information Technology Research and Development Program
4201 Wilson Blvd., Suite II-405
Arlington, VA 22230

Dear Ms. Stanley,

OMB Watch welcomes the opportunity to comment on the President's Council of Advisors on Science and Technology (PCAST) report, *Designing a Digital Future: Federally Funded Research and Development in Networking and Information Technology*. As a nonprofit organization dedicated to open government, accountability, and citizen participation since 1983, we have continually supported efforts to apply networking and information technology (NIT) to enhance government transparency and public participation. The PCAST report correctly recognizes NIT's role in this regard and suggests promising avenues for future research to support these goals. We appreciate the Networking and Information Technology Research and Development (NITRD) Program's steps to solicit public feedback on the report and are glad to provide our perspective.

OMB Watch is a nonprofit research and advocacy organization whose core mission is to promote government accountability and improve citizen participation. Public access to government information has been an important part of our work for more than 20 years, and we have both practical and policy experience with disseminating government information using NIT. For example, in 1989 we began operating RTK NET, an online service providing public access to environmental data collected by the Environmental Protection Agency. Additionally, we are

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engaged in agency regulatory processes and encourage agency rules to be sensible and responsive to public needs.

Our long held advocacy of open government makes us particularly interested in the digital democracy section of the report and we will focus our comments on that discussion. OMB Watch supports the report's vision of "digital democracy" as a more responsive and accountable government, with improved citizen participation and better access to government records and data. We also agree that "advances in NIT are essential to achieving the goals of open government" and that federal NIT research and development (R&D) investments should advance that vision.

Usability of government data, as mentioned in the report, is a critical responsibility. While echoing the report's recognition of the Data.gov initiative, we believe that government should be more than a warehouse for data. In some instances agencies should provide tools to help citizens understand and interact with those data, alongside tools provided by non-governmental entities. For instance, in 2006 we launched FedSpending.org, a website to help citizens access federal spending data. The federal contracts and assistance spending data had been available for years from the General Services Administration and the Census Bureau, but proved difficult for many users to work with. Our site strove to make it easier for citizens to answer basic questions such as who received federal spending and where was money being spent. The improvements in usability made the site highly trafficked and frequently cited by journalists and bloggers. The FedSpending.org software later served as the basis for USAspending.gov, an official government website operated by the Office of Management and Budget.

The report also emphasizes the power of data visualizations, which OMB Watch also agrees is an important tool to making complex data understandable for the public. In fact, we are presently developing data visualization platform that will allow citizens to examine federal spending data in the context of needs and government performance in different geographic regions. Such a tool

should allow the public to easily examine issues of equity and fairness of government spending through interactive national maps. Similar to our earlier work on RTK NET and FedSpending.org, our hope is to encourage the government to follow suit and develop data visualizations of its own.

However, in some cases the report's vision for digital democracy falls short. Most troublesome is the report's statement that "overregulation will be reduced because regulators have better information." In fact, public protections are usually developed through a painstaking process based on fact, science, interagency review, and extensive public comment periods. Improved information may make regulations and government programs more effective, but rarely could it replace carefully considered regulatory requirements. We strongly caution against promoting information as a means to reduce public protections.

In fact, while not completely foreclosing the possibility that overregulation occasionally takes place, we argue that underregulation is both more prevalent and more damaging. The devastating social and economic impacts of the financial crisis, the BP Deepwater Horizon oil spill, Massey Energy's Upper Big Branch mine explosion, and the thousands of Americans sickened annually by foodborne illnesses are in each case the symptom of a regulatory system which was insufficient for its task. Federal NIT R&D should properly concern itself with this problem too.

With regard to research opportunities to support NIT for digital democracy, the report identifies several promising areas. The authentication of government information, techniques to improve data quality, and widely accessible tools for data visualization are all important goals which face technical challenges. As an example of such research currently in progress, we point to the interesting work of Stuart Shulman, a National Science Foundation grantee at the University of Massachusetts Amherst, to apply text analysis methods to improve processing of records requests under the Freedom of Information Act.

In addition, research priorities identified in other parts of the report could also pay dividends for open government. Information management and preservation plays a critical role in the creation of our historical record, yet as government documents have become increasingly electronic, many experts are concerned that practices in these areas have not kept up. In addition, developing the next generation of sensors could yield increasingly low-cost, high-quality methods of detecting environmental damage – and making that information available to citizens.

In the shorter term, we agree with the report's assessment that "progress toward opening data and documents … deserve continued effort and attention." The report's recommended multi-agency effort to translate fundamental NIT research into open government practice could be a mechanism to enhance that progress. We agree that public participation is crucial in such a process. The public should help in identifying NIT developments which hold significant promise for open government applications and in establishing priorities for NIT research on open government questions. For instance, in May 2010 the Civilian Agency Acquisition Council and the Defense Acquisition Regulations Council issued an advance notice of proposed rulemaking soliciting public input on how best to publish government contracts online without revealing protected information such as trade secrets. That question could benefit considerably from a national testbed such as the report proposes.

Progress toward opening data should also include opening data about NIT R&D. We support the report's recommendation that the National Coordination Office for NITRD create a publicly available database of federally-funded NIT research.

OMB Watch appreciates the opportunity to comment on the PCAST report and we hope you take our recommendations into consideration. If you have questions about our comments or want to discuss the issues further, please feel free to contact us.

Sincerely,

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OMB Watch

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