

June 27, 2013

Mr. Raymond Ban
Chair, NOAA Science Advisory Board
Managing Director
Ban & Associates, LLC
3525 Billingsley Drive
Marietta, Georgia 30062

*Reference: **Comments on the NOAA Response to the SAB Climate Partnership Task Force (CPTF) Report: A Vision and Model for NOAA and Private Sector Collaboration in a National Climate Services Enterprise***

Dear Mr. Ban:

The NOAA SAB Environmental Information Services Working Group (EISWG) received the NOAA Response to the SAB-endorsed Climate Partnership Task Force (CPTF) Report along with an oral presentation at its December 2012 meeting. After discussing the NOAA response, the EISWG members decided to review it further and to include members of the Climate Working Group (CWG) (including the CPTF co-chair), and a member of the Data Archiving and Access Requirements Working Group (DAARWG). The following statements summarize the discussion that occurred in mid-January, 2013.

Our main conclusion is: NOAA's response to the CPTF report should be more active and should address the many key points contained in the report's recommendations.

We also bring to your attention the following comments:

- The NOAA response to the CPTF contained similar or identical comments to its response to the report, *Towards Open Weather and Climate Services* (now Open EIS). While there is some overlap of the two topics, the reviewers believe the CPTF report merits an independent and more serious consideration, including an analysis of the feasibility and benefits of the recommendations. NOAA's response is especially remarkable and puzzling because the CPTF report was generated in response to a NOAA request to the SAB that included a clearly-stated Charge and Terms of Reference. In contrast, the Open EIS report was wholly conceived and developed within EISWG and not in response to a NOAA request.

- Inquiries by CPTF members revealed that the response was written without input from key NOAA climate services managers. NOAA has proposed an elaborate structure to implement its climate goals with an “AA Climate Goal Board” and involving “Champions” and “Collaborating AAs and SO Directors” along with Councils “to serve as forums for coordination and collaboration”. Evidently, this structure might serve as a catalyst for integrating the recommendations of the CPTF into NOAA’s efforts in climate research and service. It is remarkable that it was not considered in developing the response to the CPTF report.
- The EISWG believes that NOAA should form a team to work with the climate enterprise, similar to the idea put forward at the EISWG meeting about the Open EIS approach, by adding the Director of the National Climatic Data Center and the Director of the Climate Prediction Center to the NOAA Senior Executives assigned to oversee the implementation of the CPTF report’s recommendations.
- NOAA’s response reflects only limited appreciation that its Partnership Policy—which has set in motion a positive and accelerating culture change throughout the agency to relate properly to the American weather industry—must also evolve similarly and accelerate relative to the emerging American climate industry. The Partnership Policy is a NOAA policy and should continue to be strengthened in the weather as well as other areas of NOAA.
- NOAA should review the metrics it uses to measure the value of each of its activities. It appears that some of these metrics may be in conflict with the tenets of the NOAA Partnership Policy and therefore may be in conflict with the agency’s articulated desire to work with the climate enterprise as a whole. For example, using the number of reports generated by NCDC, regardless of who requested them, has inadvertently and inappropriately taken business from private sector companies. The metrics should instead focus on reports generated for federal, state and local government entities as well as the number of visits to the NCDC website, assuming that these visits can be, or should be able to be, tallied by how many from which person or group and the trend of such visits.
- NOAA did not recognize nor take credit for some of the accomplishments that are in line with the CPTF recommendations and did not acknowledge in the response things that it has done that were specifically spelled out in the recommendations.

It is worth noting that the Charge to the CPTF specifically excluded the academic sector. Nevertheless, in its discussions CPTF recognized the contributions of this sector to the climate enterprise. NOAA should, therefore, take a holistic approach that includes all potential contributions from the government, academic, and private sectors as it attempts to move forward with the CPTF recommendations.

Finally, we believe that the nature of the NOAA response to the CPTF report and recommendations—as endorsed by EISWG, CWG, and the SAB—demonstrates a lack of appreciation for the remarkable accomplishment of the CPTF members who took time from

their demanding businesses to complete a report that NOAA requested on an urgent and unprecedented schedule set by NOAA.

We ask that the SAB urge NOAA to reconsider its response, specifically addressing the comments discussed above. Such an approach will have many benefits including demonstrating an appreciation for the efforts of the reviewers, which would have a broader, significant and positive consequence for NOAA advisory mechanisms and for the enthusiasm of the community to assist NOAA with the immense and daunting challenges it faces.

Sincerely,



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cc: Cynthia Decker, SAB Office