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Environmental Protection Agency,
EPA DocketCenter (EPA/DC),
Mailcode 6102T,
Attention Docket IDNo. EPA-HQ-OAR-2009-0171,
1200 Pennsylvania Avenue,NW, Washington, DC 20460.

6/17/09

To whom it may concern,

Please enter into the comment record this letter and attached publication titled: ***Is the U.S. Surface Temperature record Reliable?***

The publication outlines research I have done into the US Historical Climatological Network (USHCN) which is the primary climatic record of temperature and precipitation in the USA. The data from it is used as the basis for the premise that temperature is rising. While undoubtedly it has, the contribution of greenhouse gases as the primary driver of temperature increase has not been conclusively proven.

In my report I have demonstrated that almost 90% of the USHCN temperature monitoring stations are placed in such a way that they have been upwardly biased. This is likely not intentional, but the fact remains that the U.S. Temperature Record has been comprised by poor decisions on siting, sloppy quality control, and outright negligence. Only 11% of NOAA's own weather stations meet their own siting criteria to prevent pollution by encroachment of heat sources. You are in the pollution business, surely this point will be salient for you. If it were forensic science, the entire case would be thrown out.

Worse, by NOAA's own admission, adjustments designed to solve some of these problems actually contribute to the warming trend. See graphs on page 14. The magnitude of NOAA's own adjustments are approximately half of the generally agreed upon warming trend in the last century.

Yet this temperature data is used as a baseline reference for computer models of climate linking temperature rise to CO2, and hundreds of scientific studies that use the models with the temperature data as proof. It is a premise based on faulty data. In today's industry, we have quality control procedures such as ISO-9000. Yet our own National Weather Service has no such quality control for the USHCN network. To call the data from this network "robust" as some climate researches have claimed, is patently absurd.

Before you undertake making a regulation that uses the premise of temperature rise correlated with the rise of CO2, you'd better make certain that the data is in fact accurate. If you do not, you will then be negligent in your duty to the American People.

Thank you for the opportunity to comment. I hope that public comments is not simply an exercise for the purpose of the adherence to law, and that my work submitted to you will actually be considered. At one time I very much believed CO2 was the cause of temperature rise, now I believe it is lack of quality control and poorly conducted science.

I will make myself available for questions and testimony should you desire. Thank you for your consideration.

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