

Letters

Old Cars and Taxation

In his letter of 3 March (p. 1125), Gordon Tullock states, "Unfortunately either a tax on six-cylinder cars or a tax on gasoline is regressive. The poor tend to own older cars that are larger and less economical than the small new cars that are owned by upper-income groups. Therefore, the poor pay more of either of these taxes." Fifteen years ago, I thought that this was true until I looked at the data. I found that most old cars were owned by middle- and upper-income families who also tended to drive more miles (1). I found that operating expenses as a percentage of family income were virtually constant across all income groups. A recent study by the Congressional Budget Office used data from the Survey of Consumer Expenditures to examine the incidence of a variety of federal excise taxes (2). When the gasoline tax is taken as a percentage of reported current income, the tax is regressive. But for a variety of reasons (for example, temporary unemployment, illness, student status), current income is not always an accurate reflection of economic status. When current expenditures are taken as a proxy for permanent income, the gasoline excise tax is approximately neutral across all income classes. Also the study shows that 70% of the total excise tax revenues are paid by families reporting annual incomes of over \$20,000.

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Acid Rain Models

The review of acid deposition research by Stephen E. Schwartz (Articles, 10 Feb., p. 753) highlights the predilection of U.S. atmospheric scientists to denigrate the use of source receptor relations (SRRs) to develop deposition control strategies. (SRRs, which relate the proportions of deposition to the emissions from all sources, are derived from simulation modeling.) By constantly referring to the incomplete understanding

of the very complex atmospheric processes leading to acid deposition, these scientists give comfort to industrial and political leaders urging inaction on control of acid deposition precursors until a distant future when perfect scientific understanding may be reached.

European atmospheric scientists have no such problem. Since 1977, SRRs for European nations have been calculated by a Norwegian group (1) with the use of an internationally accepted model. The model is exercised each year for comparison with precipitation chemistry monitoring in most of the European countries. The 1986 agreement by most of the nations in the European Economic Community to reduce sulfur emissions by 30% (or more) by 1993 reflects the general acceptance by the participating governments of the scientists' estimates of the transboundary flow of pollution.

Similar SRRs have been developed for eastern North America (2). The agreement of the simulation model with precipitation chemistry measurements is even better than for the European model, probably because the emission inventory and monitoring quality control is superior, rather than because of better science.

Econometric studies have used SRRs to determine the least costly methods for allocating emission reductions (3). Under some circumstances, the predicted national cost saving from emission control strategies based on a better understanding of atmospheric transport is a substantial fraction of the cost of brute force methods.

It is no longer necessary to resort to crude estimates ("what goes up must come down") to justify reducing acid rain precursor emissions. Better quantitative tools are available if we decide to use them.

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Response. Fay and Golomb say my article is a source of comfort to those who would argue for inaction on control of acid deposition. Others have read it as a call for action. It should not be taken as either.

As I stated in the article, much of the motivation for determining source-receptor relations (SRRs) has been to allow development of *optimal* strategies to reduce acid deposition at sensitive locations while minimizing cost. Although I concluded that present uncertainties in SRRs preclude their being confidently used in this application, I emphasized that such uncertainties should *not* be taken as grounds to defer decisions on emissions control. I stated that postponing decisions to control emissions is equivalent to deciding to emit large quantities of acidifying substances into the environment and that decisions regarding such control can be made now on the basis of regional-mean emission fluxes.

Fay and Golomb have estimated SRRs by solving analytically the partial differential equation describing advection and diffusion (in two dimensions) and oxidation and deposition of sulfur (or nitrogen) oxides. Wind speed and direction, horizontal diffusion coefficient, and first-order rate coefficients for reaction and wet and dry deposition are all assumed to be constant spatially (over eastern North America) and temporally (for seasons or for years). These parameters are determined by least-squares fit of modeled long-term wet deposition to measured values at various sites in eastern North America; the lack of variability in wind direction is compensated for by an unrealistically large eddy diffusion coefficient. Their model does reproduce annual wet deposition patterns; although it readily predicts the amount of deposition at any receptor site attributable (according to the model) to emissions at any source. There is little a priori reason to expect these SRRs to be accurate—in contrast to physical simulation models, their model does not realistically simulate the processes that actually occur between emission and deposition.

The Lagrangian trajectory model of Eliassen and Saltbones (1) should provide more credible SRRs, in my view, because it more realistically simulates the processes occurring in the actual atmosphere. In particular, transport is described by trajectories computed from measured wind velocities. However, this model also contains many simplifications and approximations. Because of its simplicity, long runs are practical; modeled 2-year average concentrations of atmospheric SO₂ and SO₄²⁻ in precipitation agree with measurements sufficiently well to support the credibility of the general features of the model. Although the details of the simulations differ substantially within models and from model to model (1), the general results appear to be robust. These results have convinced the research community that in most of Europe, sulfur emissions from

other countries are an important contribution to total deposition. This scientific consensus, in turn, was influential in the decision by 19 European nations to reduce SO₂ emissions by 30% (2).

Such reduction in regional SO₂ emissions is an example of the sort of approach that I suggested as being based on considerations other than detailed SRRs. Although I do not denigrate the use of SRRs to develop acid deposition control strategies, neither am I willing to whitewash their present uncertainties.

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Fund-Raising and NIH

I would like to clarify a recent article by Constance Holden (News and Comment,

24 Feb., p. 1000) that did not give a clear representation of the highly overblown "controversy" concerning the fund-raising activities of the foundation I founded and its role in the administration of a grant from Bristol-Myers. The foundation was formed in June 1988 for the initial purpose of administering the Bristol-Myers grant that I was awarded in April 1988, since I was informed by my division director that the National Cancer Institute did not want to be involved in the administration of the grant. I was never informed at the time of my inquiry of any government regulations or policy specifically designed to administer an extramural grant, such as a Cooperative Research and Development Agreement (CRADA), of which I was informed 8 months after my initial inquiry and 6 months after the foundation was formed. In fact, the benefactor of the grant did not feel that a CRADA was appropriate for the grant, since the research that was being funded was based on my own proposal and did not have commercial potential. My serving on the foundation and my acceptance of a small management fee (which Bristol-Myers did not object to) for the expenditure of my own time outside of my official duties was approved verbally in September 1988, and in writing in October

1988, by the assistant director of NCI, Elliott Stonehill. The backtracking by the NCI to cover their administrative oversight by stating in January 1989 (10 months after the grant award) that my request for administering the grant via my foundation had been denied only occurred after the disclosure that I was trying to raise additional funds for the foundation via direct mail solicitation by the Watson & Hughey Co. Although this company has received a lot of "bad press" lately, it is simply not true that they have misrepresented themselves or the foundation in the mailings, which in fact, have been approved by the U.S. Postal Service. As stated by Holden, National Institutes of Health officials acknowledge that there is no official policy regarding this type of activity. Neither is there a policy regarding the founding and administration of non-profit foundations, of which there are several at NIH, while being in the employ of the federal government. If the appropriate officials at NCI had done their homework when the grant was awarded, this entire incident would have been avoided.

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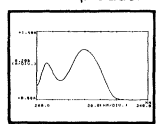
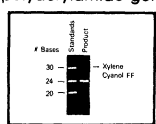
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