

## **Randall Willem Lutter, Ph.D.**

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Dr. Randall Lutter, an economist, is Visiting Scholar at Resources for the Future, a nonpartisan organization that conducts research on environmental, energy, natural resource and public health issues. He has more than 20 years senior experience in the management and evaluation of programs regulating health, safety and environmental risks, having served in three different federal agencies for four Presidents. His current research covers economic analysis of regulations, efficient air pollution regulation in the presence of variability, uncertainty and non-convexities in damages, and the performance of government agencies responding to outbreaks of foodborne illness. He also provides economic analysis and strategic advice on regulatory matters to corporate and nonprofit organizations.

From 2003 until August 2009, Dr. Lutter served at the Food and Drug Administration, including as Deputy Commissioner for Policy, where he was responsible for leading FDA's strategic planning efforts and policy analysis and development, preparedness, and oversight of FDA's advisory committees. He played a leadership role developing new policies on the safety of food from animal clones, the regulation of genetically engineered animals, the prevention of mad cow disease, and the reauthorization of user fee programs for drugs and devices. In 2008 and 2009 he initiated and led an effort to prevent future economically motivated adulteration of FDA-regulated products. At FDA he also served as Associate Commissioner for Policy and Planning and Chief Economist in the Office of Planning. From August 2009 until January 2010, Dr. Lutter served as senior economist at the federal Office of Management and Budget.

Before joining FDA in 2003, Dr. Lutter was a resident scholar with the American Enterprise Institute and fellow with the AEI-Brookings Joint Center for Regulatory Studies, where he wrote extensively on the economics of regulating health, safety and environmental risks, covering topics from air pollution including greenhouse gases, mercury and lead, to food safety and genetically engineered animals. From 1997 to 1998 he was senior economist for regulation and the environment at the President's Council of Economic Advisers and from 1991 to 1997 he served at the Office of Management and Budget in the Office of Information and Regulatory Affairs. He taught at the School of Management at the State University of New York at Buffalo after earning his Ph.D. at Cornell University in 1986. He has co-edited a book on environmental policy-making in the White House and testified before Congressional committees. His research appears in journals including the *American Economic Review*, *Journal of Political Economy*, *Environmental Science & Technology*, *Science* and the *Administrative Law Review and Regulation*.

### **PROFESSIONAL EXPERIENCE**

*Visiting Scholar*, Resources for the Future, Washington, D.C, May 2010 to the present. Co-organizer, moderator and speaker for April 7<sup>th</sup>, 2011, conference "Can Greater Use of Economic Analysis Improve Regulatory Policy at Independent Regulatory Commissions?" <http://www.rff.org/Events/Pages/Can-Greater-Use-of-Economic-Analysis-Improve-Regulatory-Policy-at-Independent-Regulatory-Agencies.aspx>, supported by the Ewing Marion Kauffman Foundation.

*Independent consultant and economist*, Bethesda, MD, January 2010 to the present.

- Conducts analysis of medical product policy issues for corporate and nonprofit organizations

- Speaks at training sessions for government officials both for the U.S. and other countries
- Chaired CropLife America Science Forum on judging the quality of scientific work. May 2011

*Senior Economist*, Office of Information and Regulatory Affairs, Office of Management and Budget. September 2009 to January 2010. Advised the OIRA Administrator, conducted economic analysis in support of regulatory review.

*Deputy Commissioner for Policy*, FDA, January 2007 to August 2009. Responsible for coordinating the development and issuance of FDA regulations and guidance documents. Directed development of strategic policy and planning, focusing on the performance of the Agency's activities. Played a lead role articulating FDA's concerns about the risks of importation of unapproved pharmaceutical products. Co-chaired the FDA's Counterfeit Drug Task Force and FDA's Nanotechnology Task Force.

- Responsible for supervision of the Offices of Policy and Planning, Counterterrorism and Emerging Threats, and Advisory Committee Oversight and Management. Supervised nearly 90 staff including lawyers, medical officers, pharmacists, economists, statisticians and operations research analysts involved in the development of science-based regulatory policies and performance-based planning.
- Led development of new policies addressing consumer safety, covering
  - genetically engineered animals
  - safety of food from animal clones,
  - risk of BSE from animal feed,
  - irradiation of leafy greens, and
  - risk of salmonella from shell eggs.
- Oversaw policy analysis for new legislative proposals, including user fee programs for drugs and medical devices
- Initiated and engineered a new effort to anticipate and prevent economically-motivated adulteration of foods and drugs, by applying an economics paradigm to adulteration. <http://www.fda.gov/NewsEvents/MeetingsConferencesWorkshops/ucm163619.htm>
- Led development of new policies on advisory committees including more stringent standards for granting waivers of conflicts of interest, more transparency in disclosure of such waivers, and more timely posting of briefing materials to the public <http://www.fda.gov/oc/advisory/aclawsregs.html>
  - Designed and oversaw studies showing greater expertise is provided by advisory committee members who need waivers for conflicts of interest <http://www.fda.gov/oc/advisory/ERGCOIreport.pdf>, and that there is no correlation between having such conflicts when duly disclosed and voting patterns <http://www.fda.gov/oc/advisory/conflictinterest/ERGCOIAndVoting011509.pdf>
- Promoted preparedness by authorizing the emergency use of doxycycline hyclate tablet emergency kits for the post-exposure prophylaxis of anthrax for eligible US Postal Service participants and their household members.
- Testified before Congress, including on drug importation,

<http://www.fda.gov/ola/2007/importdrugs30707.html> and federal preemption of state law  
<http://oversight.house.gov/documents/20080514142253.pdf>

*Associate Commissioner for Policy and Planning*, Food and Drug Administration. Led and directed policy and planning staff with expertise varying from law, microbiology, and pharmacy to economics, statistics and operations research. April 2005 to January 2007.

- Led effort to implement pedigree requirements to fight counterfeit drugs. [http://www.fda.gov/oc/initiatives/counterfeit/report6\\_06.html](http://www.fda.gov/oc/initiatives/counterfeit/report6_06.html)
- Designed and led analysis of confusing foreign drug names, resulting in first-of-a-kind public health advisory that consumers filling prescriptions abroad may get the wrong active ingredient. <http://www.fda.gov/oc/opacom/reports/confusingnames.html>
- Helped design studies to detect and assess risks to consumers of imported unapproved drug products found at international mail facilities and articulated the results of such studies to the press. <http://www.fda.gov/bbs/topics/NEWS/2005/NEW01277.html>
- Warned governors and mayors about the risks associated with programs to import unapproved foreign drugs.

*Chief Economist*, Office of Planning, Office of Policy and Planning, Food and Drug Administration. Responsible for ensuring that all FDA proposed and final regulations, prior to publication in the Federal Register, comply with Executive Order 12866, all relevant directives and requirements from the Office of Management and Budget (including the OMB guidance on economic analysis), the Regulatory Flexibility Act and the Unfunded Mandates Reform Act. Ensured analysis supporting such policy-related regulatory decisions conforms to these administrative and legal requirements. March 2003 to April 2005.

- Earned FDA Commissioner's Award for Excellence, 2004.
- Conducted and directed economic analyses of FDA regulatory issues and supervised and directed the work of the economics staff to ensure completion of economic analyses was timely and could inform leadership before relevant risk management decisions.
- Directed analysis of the economic effects of the legalization of commercial drug importation for the Department of Health and Human Services Task Force on Drug Importation. <http://archive.hhs.gov/importtaskforce/Report1220.pdf> Negotiated \$400,000 in funding for this report from the Department of Commerce and the Assistant Secretary of Planning and Evaluation of the Department of Health and Human Services.
- Led FDA technical team advising the Department of Commerce on study of the effects of foreign price controls on pharmaceutical research and development for a report to

Congress.

- Co-chaired interagency group advising OMB about its guidance to regulatory agencies on the conduct of economic analysis.

*Resident Scholar* at the American Enterprise Institute and *Fellow* with the AEI-Brookings Joint Center for Regulatory Studies. Researched costs and benefits of ongoing health, safety and environmental regulatory initiatives, and methods of evaluating regulatory effects. Areas of specialization ranged from food safety and labeling, to air pollution, global warming and toxic substances, and regulatory reform. August 1998 to March 2003.

*Senior Economist* for the environment and regulation, the President's Council of Economic Advisers, Executive Office of the President. July 1997 - August 1998.

- Analyzed economic effects of limiting greenhouse gas emissions and different arrangements for international trade in emission permits. Helped draft key Congressional testimony on the Kyoto Protocol. Initiated proposals for developing countries to accept indexed greenhouse gas emissions targets as a form of participation in the Kyoto Protocol. Presented results to top officials from the White House and Cabinet agencies.
- Analyzed electricity restructuring proposals, especially environmental policies to limit air pollutant emissions. Reviewed and critiqued key environmental regulations. Developed recommendations for members of the Council and other top White House officials.
- Analyzed major air pollution regulations and persuaded decision-makers to adopt more efficient regulatory alternatives.
- Chaired interagency group on methods of analyzing costs and benefits of federal regulations.
- Authored parts of the *Economic Report of the President 1998* and wrote several weekly economic briefings for the President.

*Staff Economist* for the Office of Information and Regulatory Affairs, Office of Management and Budget, Executive Office of the President. Summarized and justified alternative policy recommendations to White House and OMB decision-makers, giving special emphasis to market-based alternatives to traditional command and control regulations. Helped write guidance to Federal agencies on how to conduct benefit-cost analysis. Completed executive training for Senior Executive Service. September 1991 - July 1997.

- OMB Exceptional Achievement Award 1996, OMB Professional Achievement Awards, 1993, 1995.
- Staffed President Clinton's Health Care Reform Task Force and provided briefings to the Cabinet and the President about the effect of price controls.
- Drafted sections of OMB's 1996 best practices document on economic analysis of federal regulations under Executive Order 12866. [http://www.whitehouse.gov/omb/infereg\\_riaguide](http://www.whitehouse.gov/omb/infereg_riaguide)

- Was lead OMB analyst for major regulations and policy initiatives including
  - EPA's 1997 air quality standards for ozone and particulate matter
  - EPA's drinking water standards
  - USDA's EQIP and Conservation Reserve Program
  - FDA's food labeling regulations
  - FDA's tobacco regulation
  - EPA's control of toxic substances (PCBs, lead, and pesticides).

*Adjunct Professor*, Department of Economics, American University. Taught economics of health care and health policy. January 1995 - May 1995.

*Assistant Professor of Managerial Economics and Policy*, School of Management, State University of New York at Buffalo. Advised and instructed doctoral candidates, MBA candidates, and mid-career managers. Developed courses in international economics for MBA students and seminars for mid-level managers. Taught managerial economics, applied macro-economics and corporate finance. 1985 – 1991.

- Best Instructor of the Year, School of Management, 1986-1987.

*Associate Director* for the USAID-funded Institute for the Study of Free Enterprise Systems at the State University of New York at Buffalo. Planned, organized scholarly conferences, wrote periodic performance reports, prepared annual budgets, supervised research assistants. 1987 – 1991.

*Development Consultant*, U.S. Embassy, Yaounde, Cameroon. Identified locally initiated community development projects in the Republic of Equatorial Guinea, and evaluated their suitability to receive funding from Self-Help program. 1980.

*Staff*, Peace Corps, Cameroon. Responsible for support and administration of cooperative assistance program. Assessed feasibility and desirability of establishing Peace Corps program in Equatorial Guinea. 1980.

*Management Advisor*, cocoa marketing cooperative, Peace Corps, Cameroon. Designed and implemented systems for cocoa marketing, cash and produce control. Performed and supervised internal audits, assisted audits by the supervisory ministry. Provided training to cooperative staff and officials. 1978-1980.

## **RESEARCH**

### **Peer-Reviewed Articles**

Art Fraas and Randall Lutter, "The Sign Matters Too: A Comment on 'Efficient Pollution Regulation, Getting the Prices Right', by Muller and Mendelsohn", forthcoming at the *American Economic Review*. An earlier version appeared as RFF Discussion Paper 11-

36, August 2011, at

<http://www.rff.org/Publications/Pages/PublicationDetails.aspx?PublicationID=21621>

Art Fraas and Randall Lutter, “The Challenges of Improving the Economic Analysis of Pending Regulations: The Experience of OMB Circular A-4”, forthcoming, *Annual Review of Resource Economics*, DOI: 10.1146/annurev-resource-083110-120042, <http://www.annualreviews.org/doi/abs/10.1146/annurev-resource-083110-120042> An earlier version of this paper was presented at the 2010 meetings of the Society of Government Economists, George Washington University, Washington D.C. and posted as RFF Discussion Paper 10-54, December 2010.

<http://www.rff.org/Publications/Pages/PublicationDetails.aspx?PublicationID=21385>

Vernon, John A., Joseph Golec, Randall Lutter, and Clark Nardinelli, “An Exploratory Study of FDA New Drug Review Times, Prescription Drug User Fee Acts, and R&D Spending”, *The Quarterly Review of Economics and Finance*, Vol. 49, Issue 4, Pages 1260-1274, November 2009. An earlier version of this paper appeared as AEI-Brookings Joint Center for Regulatory Studies, Working Paper 6-21, September 2006,

<http://www.aei.brookings.org/admin/authorpdfs/page.php?id=1323&PHPSESSID=22b80b49d91e16bca418b95e9b212e80>

McWilliam, Andrew, Randall Lutter and Clark Nardinelli, “Healthcare Impact of Personalized Medicine Using Genetic Testing: An Exploratory Analysis for Warfarin”, *Personalized Medicine*, 5(3), 279-284, 2008. An earlier version appeared as AEI-Brookings Joint Center for Regulatory Studies, Working Paper 6-23, November 2006.

Randall Lutter and Tucker, Katherine. “Unacknowledged Health Benefits of Genetically Modified Food: Salmon and Heart Disease Deaths.” *AgBioForum*, 5(2), 59-64. 2003.

<http://www.agbioforum.org/v5n2/v5n2a04-lutter.htm>

Randall Lutter and Elisabeth League, “Mercury in the Environment: A Volatile Problem”, *Environment*, Vol. 44, Number 9, 24-40, November 2002.

Randall Lutter and Jason F. Shogren, “Tradable Permit Tariffs: How Local Air Pollution Affects Carbon Emissions Permit Trading”, *Land Economics*, Vol. 78, No. 2, 159-170, May 2002.

Randall Lutter and Elizabeth Mader, “Lead in Soil: Is Your Backyard Safer Than A Hazardous Waste Site?” *EM Magazine*, Air and Waste Management Association, 16-21, September 2001. An earlier version of this paper appeared as AEI-Brookings Joint Center for Regulatory Studies, Working Paper 00-03, June 2000.

Randall Lutter, “Getting the Lead Out Cheaply: Comments on EPA’s Proposed Hazard Standards”, *Environmental Science & Policy*, Vol. 4, 13-21, 2001. An earlier version of this paper appeared as AEI-Brookings Joint Center for Regulatory Studies, Working

Paper 99-5, May 1999.

Randall Lutter, “Developing Countries’ Greenhouse Emissions: Uncertainty and Implications for Participation in the Kyoto Agreement”, *Energy Journal*, Vol. 21, No. 4, 93- 120, October 2000.

Randall Lutter, “Food Irradiation: The Forgotten Solution to Food-Borne Illness”, *Science*, Vol. 286, 2275-2276, December 17, 1999.

Randall Lutter, John F. Morrall III, and W. Kip Viscusi, “The Cost-Per-Life-Saved Cutoff for Safety-Enhancing Regulations”, *Economic Inquiry*, Vol. 37, No. 4., 599-608, October 1999.

Randall Lutter and Christopher Wolz, “UV-B Screening by Tropospheric Ozone: Implications for the National Ambient Air Quality Standard”, *Environmental Science & Technology*, Vol. 31, 142a-146a, 1997.

Arthur Fraas and Randall Lutter, “Abandonment of Residential Housing and the Abatement of Lead-based Paint Hazards”, *Journal of Policy Analysis and Management*, Vol. 15, 424-429, 1996.

Randall Lutter and John F. Morrall III, ”Health-Health Analysis: A New Way To Evaluate Health and Safety Regulations”, *Journal of Risk and Uncertainty*, Vol. 8, 43-66, 1994.

Isaac Ehrlich, Georges Gallais-Hamonno, Zhiqiang Liu, and Randall Lutter, “Dynamic and Static Productivity Differences Across Private and Public Enterprises: Theory and Evidence,” *Journal of Political Economy*, Vol. 102, 1006-1038, October 1994.

John Logan and Randall Lutter, “Guaranteed Lowest Prices: Do They Facilitate Collusion?” *Economics Letters*, Vol. 31, 189-192, 1989.

### **Co-edited Book**

Randall Lutter and Jason F. Shogren, editors, *Painting the White House Green: Rationalizing Environmental Policy Inside the Executive Office of the President*, 2004, RFF Press. Professor Cass Sunstein of the University of Chicago described this book as indispensable reading for people interested in environmental protection. Professor Robert Stavins of Harvard University recommended it as essential reading for people interested in the applications of economics to environmental policy-making.

### **Law Articles and Briefs**

Art Fraas and Randall Lutter, “On the Economic Analysis of Regulations at Independent

Regulatory Commissions: Would Greater Use of Economic Analysis Improve Regulatory Policy at Independent Regulatory Commissions? “forthcoming *Administrative Law Review: Fall 2011*. An earlier version was posted as RFF Discussion Paper 11-16, in April 2011, and presented at RFF’s April 7<sup>th</sup>, 2011, conference “Can Greater Use of Economic Analysis Improve Regulatory Policy at Independent Regulatory Agencies?”

Randall Lutter and Dallas Burtraw, “On the Gains From Integrating Markets For Permits To Emit Related Pollutants”, *Fordham Environmental Law Journal*, Fall 2002. Also at <http://aei.brookings.org/admin/pdffiles/phpP4.pdf>. Presented at EPA NCEE Symposium on Cost-Effective Analysis for Multiple Benefits, September 2003.

Randall Lutter and Howard Gruenspect, “Assessing Benefits of Ground Level Ozone: What Role for Science in Setting National Ambient Air Quality Standards?” *Tulane Environmental Law Journal*, Vol. 15, Issue 1, 85-96, Winter 2001. A related version appeared as Regulatory Analysis 01-04, AEI-Brookings Joint Center for Regulatory Studies, [www.aei.brookings.org](http://www.aei.brookings.org), May 2001.

Randall Lutter, “Sovereignty, Federalism, and the Identification of Local Environmental Problems,” *Chicago Journal of International Law*, Vol. 2, No. 2. 447-457, Fall 2001.

Brief Amici Curiae of AEI-Brookings Joint Center for Regulatory Studies, to the Supreme Court of the United States, *American Trucking Associations, Inc., et al., v. Carol M. Browner, Administrator of the Supreme Court et al.* AEI-Brookings Joint Center for Regulatory Studies, July 21, 2000.

### **Professional Papers, Reports and Book Chapters**

Art Fraas and Randall Lutter, “Do Some NO<sub>x</sub> Emissions Have Negative Environmental Damages? Evidence and Implications for Policy”, *Environmental Science & Technology*, September 2011, Vol. 45, No.17, <http://pubs.acs.org/doi/abs/10.1021/es202622z>

Randall Lutter, “Food-Borne Illness Outbreak: Data Disclosure, Performance, and Recommendations for Reform”, *Regulation Outlook*, American Enterprise Institute for Public Policy Research, No. 2, June 2011, [www.aei.org/docLib/REG-2011-02-g.pdf](http://www.aei.org/docLib/REG-2011-02-g.pdf)

Arthur Fraas and Randall Lutter, “Can a Stew of Power Generation Regulations Clear the Air?” *Resources*, Resources for the Future, Fall 2010, No. 176, p. 30, <http://www.rff.org/Publications/Resources/Pages/Can-a-Stew-of-Power-Generation-Regulations-Clear-the-Air-176.aspx>

Randall Lutter, “Superior Salmon and More”, RFF Weekly Policy Commentary, September 27<sup>th</sup>, 2010, <http://www.rff.org/Publications/WPC/Pages/Superior-Salmon-and-More.aspx>

Randall Lutter  
CV

Begosh, Allan, John Goldsmith, Ed Hass, Randall Lutter, Clark Nardinelli, John Vernon, “Black Box Warnings and Drug Safety: Examining the Determinants and Timing of FDA Warning Labels”, *National Bureau of Economic Research Working Paper No. 12803*, issued in December 2006, <http://www.nber.org/papers/w12803>

Randall Lutter, “Are There Any Cost-Effective Greenhouse Gas Controls That Politicians Would Like?” Americans for Equitable Climate Solutions. <http://aeccs-inc.org>. 2003.

Randall Lutter and Troy Kravitz, “Do Regulations Requiring Light Trucks To Be More Fuel Efficient Make Economic Sense? An Evaluation of NHTSA’s Proposed Standards”, Regulatory Analysis 03-2, AEI-Brookings Joint Center for Regulatory Studies, at <http://aei.brookings.org/admin/pdffiles/phpsa.pdf>, February 2003.

Randall Lutter, “Rationalizing Air Pollution Regulation”, *Regulation*, Volume 25, No. 1, 6-7, 2002.

Randall Lutter and Richard Belzer, “Authors and ACACCA Agree (Mostly)”, Letter to the Editor of *Regulation*, Volume 25, No. 1, 2002.

Randall Lutter and Hoi Ying So, “Kyoto in Europe: Lessons for Policy Makers”, European Policy Forum, at [www.epfltd.org](http://www.epfltd.org), July 2002.

Randall Lutter, “CAFE-The Numbers Behind the Story”, AEI-Brookings Joint Center for Regulatory Studies, Policy Matters 02-13, <http://www.aei-brookings.org/policy/page.php?id=84>, March 2002.

Randall Lutter and Elizabeth Mader, “Litigating Lead-Based Paint Hazards: Is It A Solution?” in *Regulation through Litigation*, Kip Viscusi, ed., AEI-Brookings Joint Center for Regulatory Studies, 2002.

Randall Lutter and Elizabeth Mader, “Flushing Federalism”, AEI-Brookings Joint Center for Regulatory Studies, Policy Matters 01-27, November 2001.

Randall Lutter and Elizabeth Mader, Letter to the Editor about “Lead in Soil: Is Your Backyard Safer than a Hazardous Waste Site” *EM Magazine*, Air and Waste Management Association, 6, November 2001.

Randall Lutter, Elizabeth Mader, and Nathan Knuffman, “Regulating Mercury Emissions: What Do We Know About Costs and Benefits?” AEI-Brookings Joint Center for Regulatory Studies, Regulatory Analysis, <http://www.aei.brookings.org> March 2001.

Randall Lutter and Elizabeth Mader, “Health Risks From Mercury-Contaminated Fish: A Reassessment”, AEI-Brookings Joint Center for Regulatory Studies, Related Publication, March 2001.

Robert W. Hahn, Randall Lutter, and W. Kip Viscusi, Do Federal Regulations Reduce Mortality? AEI-Brookings Joint Center for Regulatory Studies, Washington D.C. [www.aei.brookings.org](http://www.aei.brookings.org), November 2000.

Randall Lutter and Richard B. Belzer, “EPA Pats Itself on The Back”, *Regulation*, Volume 23, No. 3, 23-28, 2000.

Nathan Knuffman and Randall Lutter, “Does Mercury in Fish Come from the Air?” AEI-Brookings Joint Center for Regulatory Studies, AEI-Brookings Joint Center for Regulatory Studies, Working Paper 00-06, September 2000.

Randall Lutter, “Valuing Children’s Health: A Reassessment of the Benefits of Lower Lead Levels”, AEI-Brookings Joint Center for Regulatory Studies, Working Paper 00-02, March 2000.

Randall Lutter, “Is EPA’s Ozone Standard Feasible?” AEI-Brookings Joint Center for Regulatory Studies, Regulatory Analysis 99-6, 1999.

Randall Lutter, “An Analysis of the U.S. Department of Agriculture’s Proposal to Allow Irradiation of Meat”, AEI-Brookings Joint Center for Regulatory Studies, Regulatory Analysis 99-2, July 1999.

Randall Lutter, “The Role of Economic Analysis in Regulatory Reform”, *Regulation*, Volume 22, No. 2, 38-46, 1999, <https://www.cato.org/pubs/regulation/regv22n2/econanalysis.pdf>

Randall Lutter, “An Analysis of the Use of EPA’s Clean Air Benefit Estimates in OMB’s Draft Report on the Costs and Benefits of Regulation”, AEI-Brookings Joint Center for Regulatory Studies, Comment 98-2, October 1998.

### **Independent Testimony**

Randall Lutter, “Environmental Regulation, the Economy and Jobs”, Testimony Before the Energy and Commerce Committee Subcommittee on Environment and the Economy, February 15, 2011. <http://www.rff.org/RFF/Documents/RFF-CTst-Lutter-Feb152011.pdf>

Randall Lutter, “Agencies’ Regulatory Analyses Should Be Subject to Genuinely Independent Peer-Review,” Testimony Before The Water Resources and Environment Subcommittee of the House Transportation and Infrastructure Committee, Hearing on Independent Peer-Review of Scientific, Technical and Economic Products that Support

Agency Decision-Making, March 5, 2003.

<http://aei.brookings.org/publications/abstract.php?pid=315>

Randall Lutter and Elisabeth Irwin, “FDA Should Allow Food Labeling Claims About Nutrient Content and Health”, to the Food and Drug Administration, AEI-Brookings Joint Center for Regulatory Studies, Testimony 02-8, September 2002.

<http://aei.brookings.org/admin/pdffiles/phpUe.pdf>,

Randall Lutter, “Improving Regulatory Analysis at the Environmental Protection Agency”, Testimony Before the House Committee on Small Business, Subcommittee on Regulatory Reform and Oversight, November 2001.

[www.aei.brookings.org/publications/testimony/testimony\\_01\\_05.pdf](http://www.aei.brookings.org/publications/testimony/testimony_01_05.pdf),

Robert W. Hahn and Randall Lutter, “Elevating EPA to Cabinet Status”, Testimony before the House Committee on Government Reform, Subcommittee on Energy Policy, Natural Resources, and Regulatory Affairs, September 2001.

[www.aei.brookings.org/publications/testimony/testimony\\_01\\_04.pdf](http://www.aei.brookings.org/publications/testimony/testimony_01_04.pdf)

### **Selected Presentations**

Randall Lutter, “Regulations and Jobs, An Economist’s Views”, presented at the annual meetings of the Administrative Law Section of the American Bar Association, November 2010, Washington D.C.

Randall Lutter, Improving Food Safety: How Best to Quantify Public Health Agencies’ Performance Responding to Outbreaks of Foodborne Illness? American Society of Health Economists, Cornell University, June 2010.

Randall Lutter, “Regulatory Oversight and Productivity in Pharmaceutical Innovation: A Perspective from FDA”, American Society of Health Economists, Duke University, June 2008.

Randall Lutter, “New Perspectives on Pharmaceutical Innovation”, American Society of Health Economists, Duke University, June 2008.

Randall Lutter, “The Wrongful Segregation of Risk Assessment and Benefit-Cost Analysis”, Society for Risk Analysis, New Orleans, December 2002.

Randall Lutter, “Improving RIA Quality: Insights from the U.S.” APEC-OECD Co-operative Initiative on Regulatory Reform. Merida, Mexico, April 2002.

Randall Lutter, “CAFE After 9/11”, Society of Automotive Analysts, Detroit, January 8, 2002.

Randall Lutter, "Economic Analysis of Regulation in the U.S.: What Lessons for the European Commission?" Report to the Enterprise Directorate General, European Commission, For the Workshop on Impact Assessment in Member States, Brussels, June 26, 2001. [http://ec.europa.eu/enterprise/policies/better-regulation/files/study\\_en.pdf](http://ec.europa.eu/enterprise/policies/better-regulation/files/study_en.pdf)

Arthur Fraas and Randall Lutter, "Regulatory Analysis: Past Experience with EPA Analysis and New Challenges", presented at the annual meeting of the *Southern Economic Association*, Washington D.C., 1996.

Randall Lutter, "Distributional Effects of Selected Environmental Regulations", presented at the annual meeting of the *Southern Economic Association*, Washington D.C., November 1996.

Randall Lutter, "Allocative Inefficiencies of State Owned Enterprises in Imperfectly Competitive Markets: Evidence from Air Transport," presented at the *American Economics Association* meetings, January 1992.

William Hamlen, Jr. and Randall Lutter, "The Effects of Foreign Debt on International Asset Prices", presented at the *Eastern Finance Association* meetings, April 1991.

## **GENERAL ARTICLES/ APPEARANCES**

Randall Lutter, "Building Carbon Emissions Markets", Panel Discussion on Policy Options for Power Plant Multi-Emission Control Legislation, Americans for Equitable Climate Change Solutions, December 10<sup>th</sup>, 2002.

Randall Lutter, "'Gone Fishin' For Nutrition' Misses an Important Point", Letter to the Health Editor, *Washington Post*, November 26, 2002.

Randall Lutter, "FDA Squashes Fish Tales", *Washington Times*, <http://www.washtimes.com/commentary/20021029-84262998.htm>, October 29, 2002.

Randall Lutter, "What Grade for Government Regulations?" Administrative Law Section of the American Bar Association, Washington D.C., October 2002.

Randall Lutter, "Litigating Lead Hazards: Is it a Solution?" at conference on "Finding Effective Solutions for Lead Base Paint Hazards", Center for Legal Policy Forum of the Manhattan Institute for Policy Research, Providence, R.I., June 19<sup>th</sup>, 2002.

Randall Lutter, "Clean Air and Polluted Science", *Washington Times*, March 25, 2002, also *On the Issues*, American Enterprise Institute, and AEI-Brookings Joint Center for Regulatory Studies, *Policy Matters 02-12*, March 2002.

Randall Lutter, “Bountiful Incentives”, Tech Central Station At <http://www.techcentralstation.com>, March 2002.

Randall Lutter, “Rationalizing Air Pollution Regulation”, Presentation at conference *Regulating Air Pollutants from Power Plants: What is Sensible?* by the AEI-Brookings Joint Center for Regulatory Studies. February 19<sup>th</sup>, 2002.

Randall Lutter, “How to Get Clean Air At Less Cost”, *Washington Times*, February 5<sup>th</sup> 2002, also *On the Issues*, American Enterprise Institute, and AEI-Brookings Joint Center for Regulatory Studies, *Policy Matters 02-6*, February 2002.

Randall Lutter, “Put a Price on His Head”, Tech Central Station At <http://www.techcentralstation.com/DefenseExtra.asp?id=160>, January 2002, also *On the Issues*, American Enterprise Institute for Public Policy Research.

Randall Lutter, Radio interview on global warming with The Voice of America, December 18, 2001.

Randall Lutter, “Refining Repairs to Regulatory Reform”, Presentation to the Weidenbaum Center Forum “Executive Regulatory Review: Surveying the Record, Making it Work”, National Press Club, Washington, D.C., December 17, 2001.

Randall Lutter, “Litigating Lead Hazards: Is it a Solution?” at conference on “Finding Effective Solutions for Lead Base Paint Hazards”, Center for Legal Policy Forum of the Manhattan Institute for Policy Research, Baltimore, December 13, 2001.

Randall Lutter, “Chill Out on Warming” in German, *Financial Times Deutschland*, April 10, 2001.

Randall Lutter, “Ignoring All Costs Won’t Clean Our Air”, *Los Angeles Times*, March 5, 2001.

Randall Lutter, The Benefits and Costs of Regulating Mercury Emissions From Utilities, Presentation at Resources for the Future, January 17, 2001.

Randall Lutter, Heather Ross and John Fialka, Videotaped panel discussion for the *National Economists Club Education Foundation*, “Air Quality Costs and Benefits: In Economics and the Law”, January 10, 2001.

Randall Lutter, Interview on the Supreme Court’s review of the Environmental Protection Agency’s 1997 air quality standards, *National Public Radio*, Salt Lake City, November 14, 2000.

Randall Lutter, “Costs Swamp Benefits”, *Los Angeles Times*, November 7, 2000.

Randall Lutter, "Clouds on the Open Sky Horizon", *Washington Times*, A2, June 12, 2000.

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## **EDUCATION**

### **Degrees:**

Ph.D. Economics, Cornell University, 1986

M.A. Economics, Cornell University, 1983

B.A. Economics, University of California, Berkeley, 1977: Phi Beta Kappa

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**Seminars / Presentations** given at: American Bar Association, American Economics Association, American Enterprise Institute, Americans for Equitable Climate Solutions, American University, American Water Works Association, Boston University, Brookings, Cornell University, Duke University, Eastern Finance Association, European Association for Research in Industrial Economics, European Commission (Enterprise DG), Food and Drug Administration (CFSAN), George Washington University, Michigan State University, National Economists Club, National Economists Club Education Foundation, Resources for the Future, Society for Risk Analysis, Southern Economics Association, State University of New York at Buffalo, University of Delaware, University of Maryland, University of Maryland Baltimore County, University of Minnesota, University of Wyoming, U.S. Department of Agriculture (Economic Research Service), Western Economics Association, the World Bank.

**Referee** for: AEI, AEI-Brookings Joint Center for Regulatory Studies, *American Economic Review*, *American Journal of Public Health*, Brookings, Congressional Budget Office, *Energy Journal*, *International Journal of Industrial Organization*, *Journal of Air and Waste Management*, *Journal of Benefit-Cost Analysis*, *Journal of Environmental Economics and Management*, *Journal of Industrial Economics*, *Journal of Risk and Uncertainty*, Office of Management and Budget, *Operations Research*, *Management Science*, Prentice-Hall, Smith-Richardson, the World Bank.

**Personal Interests:** Whitewater kayaking (First place master, Over-the-Falls Race, Ohiopyle, PA, 2007-2009 [www.fallsrace.com](http://www.fallsrace.com); Cheat River Race 2008, 2010, 2011

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