

**Establishment of the Office of Science Advisory Committee (SCAC)  
Sworn Analytic Statement under the APA, PRA, Fairness, and OMB A-4**

Docket: *(none – general Federal Register notice)*

Agency/Office: **Department of Energy – Office of Science**

Subject: **Establishment of the Office of Science Advisory Committee (SCAC) and termination of six programme-specific advisory committees.**

By: **James Hunter Poole, Executive Chairman & CEO, Obelisk Tech Systems Inc.**

Location: **Thomasville, Georgia**

Submission Type: **Sworn analytic comment + administrative evidence entry**

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## **1. Purpose (Plain English)**

On November 18, 2025, the Department of Energy announced the establishment of a unified Office of Science Advisory Committee (SCAC) for a two-year term, consolidating six former program-specific advisory committees into one body. This restructuring is an administrative and national-capacity decision with cross-agency consequences.

This sworn analytic comment supplies material evidence into the administrative record urging that the SCAC charter:

1. require formal evidence-building outputs that are audit-ready under OMB A-4/A-11;
  2. mandate cross-agency coordination across DOE, NSF, NASA, DoD, NIST, and relevant statutory partners; and
  3. treat workforce and regional human impacts as first-order cost-benefit variables.
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## **2. Standing and Evidence-Building Authority**

I submit this sworn statement as Executive Chairman & CEO of Obelisk Tech Systems Inc., an American advanced-technology company with public-company readiness and founder-controlled governance designed for national-scale execution. Obelisk has repeatedly produced sworn analytic submissions and technical evidence to federal agencies,

demonstrating the capability to reduce paperwork burden, strengthen auditability, and support interagency evidence pipelines.

I have standing as a federal commenter and inventor with a demonstrated portfolio of domestic, infrastructure-grade AI and verification systems directly relevant to DOE science missions.

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### 3. Administrative Energy & Oversight Flywheel (Record-Impact Mechanism)

Creation of SCAC consolidates administrative energy by centralizing scientific advice into a single, higher-signal interagency node. To maximize impact, SCAC should deliberately run an oversight flywheel:

1. **Evidence enters the record** through sworn analytic filings and technical appendices (APA/PRA trigger).
2. **Agency recognition** validates, indexes, and preserves evidence for reuse.
3. **Funding & policy leverage** flows from validated record materiality under OMB A-4/A-11.
4. **More submissions & pilots** across agencies reinforce the SCAC governance loop.

A unified SCAC can become DOE's evidence refinery for national science programs if charter language requires measurable outputs rather than advisory narratives alone.

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### 4. Cross-Agency and Statutory Relevance

SCAC's work is materially governed by and must align with:

- the Federal Advisory Committee Act (balanced representation, transparency, proper scope);
- APA §553(c) public-comment standards and §706 review materiality;

- the Paperwork Reduction Act burden-minimization and information-quality integrity standards;
- OMB Circulars A-4 and A-11 for cost-benefit and evidence-building;
- Executive Order 12866 interagency circulation and OIRA coordination;
- Executive Order 14110 and related trustworthy-AI and infrastructure-risk controls.

Because Office of Science programs routinely span DOE, NSF, NASA, DoD, and national laboratories, SCAC outputs will necessarily carry interagency implications and must be designed to travel cleanly across those review chains.

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## 5. Patent / Portfolio Relevance to SCAC Mission (SBIR/STTR Signaling)

Obelisk provides a patent-anchored, infrastructure-grade AI and verification stack that directly supports DOE science imperatives in trustworthy AI, secure data sharing, critical-minerals mapping, resilient computing, and satellite-enabled sensing. My active USPTO portfolio includes (non-exhaustive key filings):

1. **Adaptive Multimodal Security Fusion & Chain-of-Custody System** — Application 63/881,268.
2. **Section 508 Continuous Remediation Proof Ledger (508-CRP)** — Application 63/881,269.
3. **AI-Driven Mineral Field Detection & Strategic Supply-Chain Mapping** — Application 63/909,860.
4. **Federated Learning Data Isolation for Mobile Defense Devices** — Application 63/909,864.
5. **CryptexQ Quantum-Resilient FPGA Encryption Architecture** — Application 63/909,875.
6. **Satellite-Based AI Imaging Relay (Vigilant Orbit Framework)** — Application 63/909,876.

These filings collectively meet the combined requirements for secure federated research workflows, audit-ready evidence trails, cross-agency interoperability, and resilient national-capacity infrastructure. They are SBIR/STTR-ready in scope and pilot-deployable without foreign tooling dependence.

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## **6. Employment & Human-Impact Narrative**

Federal science programs are also labor policy. When advisory structures are fragmented or slow, research pipelines stall and communities absorb the shock through lab contraction, industrial pullback, and delayed technology transfer. My region has lived this firsthand: South Georgia's timber and mill collapses erased over 1,600 livelihoods and hollowed out town-level supply chains. The downstream human cost of institutional lag is real, measurable, and preventable.

A unified SCAC can prevent cascading job loss by enforcing early detection of program drag, procurement friction, transition failures, and infrastructure underinvestment.

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## **7. Risk / Loss Assessment (Non-Adoption)**

If SCAC is formed without modern evidence and coordination mandates:

- legacy fragmentation persists, duplicating effort and slowing innovation;
  - labs and industrial partners face delay-driven layoffs;
  - information-quality failure risk rises due to inconsistent standards;
  - interagency coordination load grows, wasting staff time and weakening adoption velocity across federal science lanes.
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## **8. Interagency Coordination & Notification Request**

Please circulate this sworn analytic evidence under Executive Order 12866 §6(b)(1) to:

- OMB/OIRA and the DOE Office of Science leadership;
  - DOE PRA / Information Collection authority;
  - GAO and the DOE Inspector General;
  - partner agencies with joint science and infrastructure lanes including NSF, NIST, NASA, DoD, and DHS, as appropriate to SCAC scope.
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## 9. Administrative Determination Requested

I request a formal determination that this sworn analytic record is material under OMB A-4 and APA §706, preserved in the permanent administrative record, and that SCAC's charter explicitly incorporate the evidence and recommendations herein — including measurable evidence outputs, PRA burden reduction, workforce-impact accounting, and cross-agency coordination as mandatory operating requirements.

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## 10. Signature Block and Sworn Declaration

I, **James Hunter Poole**, declare under penalty of perjury pursuant to 28 U.S.C. §1746, and consistent with 5 U.S.C. §553(c), 44 U.S.C. §3511(b), OMB Circulars A-4/A-11, and the relevant Executive Orders cited herein, that the foregoing information is true and correct to the best of my knowledge and belief and is submitted for permanent inclusion in the administrative record.

Executed this **30th day of November 2025**.

Signature: \_\_\_\_\_

**James Hunter Poole**

Executive Chairman & Chief Executive Officer

**Obelisk Tech Systems Inc. | SAVE THE AMERICAN COMMUNITIES LLC**

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Thomasville, GA 31757-2232

savetheamericancommunities@gmail.com

