



May 9, 2006

Dr. Scott A. Masten, Director
Office of Chemical Nomination and Selection
NIEHS/NTP
P.O. Box 12233, MD A3-07
111 T.W. Alexander Drive
Research Triangle Park, NC 27709

RE: Nomination for Testing of Decabromodiphenyl oxide (CAS 1163-19-5) by CPSC

Dear Dr. Masten,

The U.S. Consumer Product Safety Commission (CPSC) has proposed that NTP conduct a developmental neurotoxicity study on decabromodiphenyl oxide (DBDPO) using established, recognized protocols such as OPPTS 870.6300 (EPA 1998). The NTP announced this proposal in the April 11, 2006 Federal Register and asked for comments. The Brominated Flame Retardants Industry Panel (BFRIP), an American Chemistry Council CHEMSTAR panel, is responding to this request on behalf of its members, the three major U.S. producers that include Albemarle Corporation, Ameribrom, Inc. an Israeli Chemical Industrial Products Company and Chemtura Corporation. BFRIP appreciates the opportunity to respond and notes that these three companies will be conducting a developmental neurotoxicity study in rats in the coming months. This study will be sponsored by the Bromine Science and Environmental Forum (BSEF). The member companies of BFRIP also are member companies of BSEF.

Since a similar study was requested by the European authorities, the design of this study is being discussed with the Europeans and overseen by the French rapporteur, Mrs. Claire Beausoleil from France. We would urge the NTP to postpone any decision to test at least until the protocol for this DNT work is finalized later this year or in early 2007. The NTP is welcome to contact BFRIP and/or Mrs. Beausoleil at (Claire.beausoleil@inrs.fr) to learn more details.

Sincerely,

Nancy Sandrof, M.P.H.
Manager, BFRIP
American Chemistry Council

