Dear RADM Stokes:

This letter is in response to Dr. Linda Birnbaum’s letter of June 30, 2011, to the Occupational Safety and Health Administration (OSHA), in which she forwarded the recommendations for a specific criterion for the murine local lymph node assay (LLNA) to be used in potency categorization of chemicals that may cause allergic contact dermatitis (ACD) in humans.

Sections 4(a) and 4(d) of the ICCVAM Authorization Act require agencies to review ICCVAM test method recommendations and notify ICCVAM in writing of their findings, including identification of the relevant test methods for which the ICCVAM test recommendations may be added or substituted.

The received document was reviewed by staff in OSHA’s Directorate of Standards and Guidance. As you may know, OSIIA does not require or enforce toxicity testing as a part of its regulatory activities. At this time, we have no relevant test methods for which the ICCVAM recommendations may be added or substituted. OSIIA does, however, endorse the recommendations and the continued work to promote the development and use of alternative test methods.

Thank you for your valuable work in this field. We look forward to continued participation on the ICCVAM.

Sincerely,

/s/

David Michaels, PhD, MPH