



Centers for Disease Control  
and Prevention (CDC)  
Atlanta GA 30333

MAR 4 2010

RADM William S. Stokes  
Executive Director  
ICCVAM  
National Institute of Environmental Health Sciences  
Post Office Box 12233  
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Research Triangle Park, North Carolina 27709

Dear Dr. Stokes:

I am writing in response to a letter from Dr. Linda S. Birnbaum, Director, National Institute of Environmental Health Sciences (NIEHS), requesting that the Agency for Toxic Substances and Disease Registry (ATSDR) review the following two products of the Interagency Coordinating Committee on the Validation of Alternative Methods (ICCVAM) and the National Toxicology Program Interagency Center for the Evaluation of Alternative Toxicological Methods (NICEATM). Please excuse the delay of this response.

Thank you for the opportunity to review and comment on these proposed methods:

*ICCVAM Test Method Evaluation Report, "The reduced murine local lymph node assay: an alternative test method using fewer animals to assess the allergic contact dermatitis potential of chemicals and products"* (NIH Publication No: 09-6439), and

*Recommended performance standards: Murine Lymph Node Assay* (NIH Publication No. 09-7357).

First, I commend the work of ICCVAM toward reduction, refinement, and replacement of animals in toxicity testing. This challenge is a tremendous one that our society faces: new chemicals are being introduced into commerce at an ever-increasing pace, while the resources to test them are limited. Promoting advances in alternative methods and maintaining scientific quality without compromising human, animal, and environmental health, however, should remain our goal.

The Centers for Disease Control and Prevention (CDC)/ATSDR concurs with your recommendations regarding these methods and agrees that these test methods should be considered before using animals for allergic contact dermatitis testing. These methods should be used when determined to be appropriate. As presented, the validation study that was conducted to characterize the accuracy and reliability of these tests was well organized and well managed by NICEATM. For example, the study shows thorough documentation with recommendations about standardized protocols, means of improving the utility of the methods, and standards that can be applied to similar methods and models in the future.

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Thank you again for your letter. If you need further information, please contact Dr. Moiz Mumtaz, Science Advisor, Division of Toxicology and Environmental Medicine (DTEM), our principal agency representative to ICCVAM, at (770) 488-3349 or Dr. Bruce Fowler, Assistant Director of Science, DTEM, ATSDR, at (770) 488-7250.

Sincerely,

/s/

Thomas R. Frieden, M.D., M.P.H.  
Director, CDC, and  
Administrator, ATSDR

cc:

Linda Birnbaum, Director, NIEHS  
Moiz Mumtaz, Ph.D.  
Bruce Fowler, Ph.D.