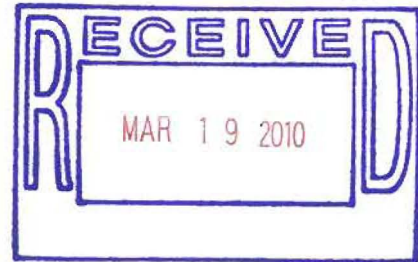




MAR 16 2010

RADM William S. Stokes
Director
National Toxicology Program
Interagency Center for the Evaluation
of Alternative Toxicological Methods
NIEHS
P.O. Box 12233, Mail Code K2-16
Research Triangle Park, NC 27709



Dear RADM Stokes:

This letter is in response to Dr. Linda Birnbaum's letter of September 18, 2009, to the Occupational Safety and Health Administration (OSHA), in which she forwarded an in vitro test method, the reduced murine local lymph node assay (rLLNA), for assessing the potential for allergic contact dermatitis (ACD) caused by chemicals and products. The detailed recommendations and rLLNA test method were provided in "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" and "Recommended Performance Standards: Murine Local Lymph Node Assay."

This test method was proposed by the Interagency Coordinating Committee on the Validation of Alternative Methods (ICCVAM) for our consideration. 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 documents were reviewed by staff in OSHA's Directorate of Standards and Guidance. Based on this review, OSHA finds these recommendations are within the scope of the ICCVAM mission. We agree with ICCVAM that although the rLLNA test method cannot be considered a complete replacement for LLNA, the rLLNA is a permissible test method that may be used as an alternative to traditional multi-dose LLNA.

As you may know, OSHA 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. OSHA 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,

A handwritten signature in black ink, appearing to read "DM", is positioned above the printed name.

David Michaels, PhD, MPH