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8 January 2008

William S. Stokes, D.V.M.
Director, National Toxicology Program Interagency Center
For the Evaluation of Alternative Toxicological Methods
Environmental Toxicology Program
National Institute of Environmental Health Services
P.O. Box 12233, MD EC-17
Research Triangle Park, NC 27709

Dear Dr. Stokes:

As you know, over the last several years a number of companies manufacturing antimicrobial cleaning products have been working together to develop an approach – not using animals – that would allow the assessment of eye irritation potential for these products and the determination of the appropriate U.S. Environmental Protection Agency (EPA) labeling requirements. These companies (Clorox, Colgate-Palmolive, Dial, EcoLabs, Johnson Diversey, Procter & Gamble, and SC Johnson and Son) together with the Institute for In Vitro Sciences, Inc. (IIVS) formed an informal group – the Alternative Testing Working Group – to conduct the appropriate investigatory testing, share data, and put together a comprehensive Background Review Document (BRD) describing the final approach.

This BRD has now been completed, and three hard copies plus an electronic copy on a CD were shipped to you on 21 December 2007.

The ATWG requests that NICEATM/ICCVAM now perform a technical review of the approach presented in the BRD. Since the BRD covers only a non-animal testing approach for a specific category of products, namely antimicrobial cleaning products, we ask that it be reviewed to determine if the approach presented can assure EPA, with a reasonable degree of certainty, that the agency can make labeling decisions for antimicrobial cleaning products that appropriately inform the user.

We realize that the document is rather large and that questions may arise during its review. I, or other members of the ATWG, would be more than happy to address – either by telephone or in person - with the NICEATM or ICCVAM staff, any questions concerning the logic behind the approach or any of the data that are contained in the document.

Sincerely,

/s/

Rodger D. Curren, Ph.D.
President, Institute for In Vitro Sciences, Inc.

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