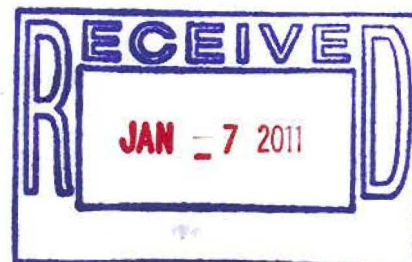




United States Department of the Interior

U.S. GEOLOGICAL SURVEY
Reston, Virginia 20192

In Reply, Refer To:
MS 953
GS11000128



January 6, 2011

Rear Admiral William S. Stokes
Director, National Toxicology Program
Interagency Center for the Evaluation of
Alternative Toxicological Methods
National Institute of Environmental Health Sciences
P.O. Box 1223, Mail Code K2-16
Research Triangle Park, NC 27709

Dear Rear Admiral Stokes:

In a letter dated September 2, 2010, to Secretary of the Interior, Mr. Ken Salazar, Dr. Linda S. Birnbaum of the National Institutes of Health requests Departmental review of several laboratory animal testing documents. As requested by Dr. Birnbaum, the U.S. Geological Survey (USGS) is responding for the Department to you. The USGS appreciates the opportunity to review and comment upon the documents describing:

- (1) pain management procedures when conducting ocular test for regulatory purposes (NIH Publication 10-7514),
- (2) cytosensor microphysiometer method to identify substances that cause severe or permanent eye injury (NIH Publication Number 10-7553A and 10-7553B),
- (3) proposed in vitro testing strategy for ocular hazard classification and labeling of antimicrobial cleaning products (NIM Publication Number 10-7513), and
- (4) recommendation to discontinue the low volume eye test for ocular safety testing (NIH Publication 10-7515).

Earlier versions of these documents were reviewed and commented upon by Department of the Interior scientists, who found them to be well written and scientifically robust.

Although the Department of the Interior conducts ecotoxicological research and monitoring of fish and wildlife, it has very limited regulatory authority for chemicals and pharmaceuticals. At present, the Department of the Interior does not evaluate the potential of substances to cause ocular toxicity. Nonetheless, we do support new methods and strategies that reduce the number of test animals in such evaluations. We will alert Institutional Animal Care and Use Committees at our research facilities about these new procedures. We are pleased to assist in such reviews, and will gladly provide in depth comments on those test methods that are more closely allied to our mission.

Sincerely,

/s/

David P. Russ
Regional Executive, Northeast Area