

Rec'd 3/19/2013



U.S. Department
of Transportation

**Pipeline and Hazardous
Materials Safety
Administration**

Administrator

1200 New Jersey Avenue SE
Washington, DC 20590

MAR 11 2013

RADM William S. Stokes
Director, National Toxicology Program
Interagency Center for the Evaluation of
Alternative Toxicological Methods
P.O. Box 12233 (Mail Code B2-1)
Research Triangle Park, NC 27709

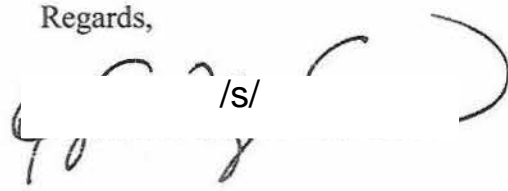
Dear RADM Stokes:

This letter responds to Linda Birnbaum's September 19, 2012 request that the Department of Transportation (DOT) review and comment on the Interagency Coordinating Committee on the Validation of Alternative Methods (ICCVAM) toxicological test method evaluation report entitled "Identifying Chemical Eye Hazards with Fewer Animals." Dr. Birnbaum's letter and the ICCVAM evaluation were referred to the Pipeline and Hazardous Materials Safety Administration (PHMSA), the agency within DOT responsible for regulating the transport of hazardous materials in commerce and participating in the ICCVAM.

Although PHMSA's hazardous materials classification systems are designed to protect human life and health, property, and the environment, their main focus from a toxicological standpoint is protection from acute exposures to these hazardous materials during transportation. Eye hazards, including visual impairment, are not one of the criteria incorporated in the regulatory requirements in the Federal Hazardous Materials Regulations (HMR 49 CFR 171-180), administered by PHMSA. We hope that the potential of these recommendations to reduce and refine the use of animals for assessing eye hazards can be extended to other areas of toxicological criteria such as acute inhalation toxicity, acute dermal toxicity, acute oral toxicity, and acute dermal corrosivity for PHMSA's consideration for possible adoption. However, we do not currently intend to adopt the systems for classifying toxic materials based on eye hazards into our systems in the HMR. Please rest assured that in addition to safety being our highest priority, PHMSA constantly promotes ways to avoid unnecessary sacrifices of animals in deriving toxicological end points needed for classification of hazardous materials.

Thank you for offering PHMSA the opportunity to serve as a member of ICCVAM and to formally comment on ICCVAM evaluation reports. If we can be of further assistance or answer any additional questions, please do not hesitate to contact Dr. Steve Hwang, our ICCVAM representative from the Office of Hazardous Materials Safety, at 202-366-4476.

Regards,

Handwritten signature of Cynthia L. Quarterman, consisting of a stylized 'C' followed by 'L' and 'Q' with a large flourish.

Cynthia L. Quarterman