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Dr. Bill Stokes, Director
NTP Interagency Center for the Evaluation of Alternative
Toxicological Methods (MD EC-17)
National Institute of Environmental Health Sciences
P.O. Box 12233
Research Triangle Park, NC 27709

Dear Dr. Stokes,

Since the Interagency Coordinating Committee on the Validation of Alternative Methods (ICCVAM) has invited public comment on three non-animal test methods before they are approved for use in the United States, I have decided to write you my comments.

These methods (EPISKIN(tm), EpiDerm(tm) and Rat Skin transcutaneous electrical resistance assay) can totally replace the cruel use of rabbits and other animals in skin corrosion studies (which cause horrendous suffering as chemicals eat through the animals' skin, causing painful and irreversible damage).

Using non-animal testing methods as part of an integrated testing scheme (in which animal tests may be used to confirm

the non-animal test results) is not enough. The suffering of animals for these cruel experiments should be eliminated altogether.

The welfare of humans as well as non-humans must be of ultimate concern to your agency. Alternative methods must be used at all times.

Sincerely,

Jill Schechter