

Richard Firth
Private Citizen

April 12, 2018

Subject: RFR Written Comments

Comment:

I am writing to oppose the continued use of rats and mice in experiments conducted by the National Toxicology Program (NTP) to study risks from exposure to cell phone radiation.

Results from the NTP's, ten-year, \$25 million rat and mouse study have merely produced confusing and inapplicable data. This is typical of animal toxicity tests and the reason behind the recently issued Strategic Roadmap, which calls for shifting to methods that yield more human-relevant data and reducing the use of animals in safety testing.

The NTP cell phone radiation study on animals has been labeled "complete," yet we understand there are plans to use approximately 300 more animals in addition to the 3,000 already killed in this study.

We applaud the NTP and NIEHS for taking the important step of issuing the Strategic Roadmap. However, given the severe limitations of animal tests, the availability of new technologies that perform better, and the announcement of the Strategic Roadmap to utilize more relevant human test methods, it is unjustifiable – indeed unconscionable – to allow more animals to die in the remaining NTP study. I respectfully request that the NTP immediately and permanently terminate these experiments.

Thank you for your attention to this important matter.