



12 June 2007

Dr. William S. Stokes
NICEATM Director
NIEHS
Research Triangle Park. NC 27709
Via E-mail: niceatm@niehs.nih.gov

Re. Federal Register 72 (95), May 17, 2007, pages 27815-27817

Dear Dr. Stokes

I am writing to you on behalf the CESIO Local Lymph Node Assay Task Force (CESIO is the Sector Group of CEFIC dealing with organic surfactants and their intermediates). This Task Force was established in 2006 with the aim to exchange the experiences of the different Industry Sectors using the Local Lymph Node Assay (LLNA) for sensitisation testing.

The Task Force noted that several Industry sectors experienced positive results in the LLNA that were unexpected on the basis of the structure activity relationships (SAR's) or considered false positive results on the basis of guinea pig tests, human experience or other information.

The experience of the Task Force with the LLNA has been summarised in the following report: A. Penninks (2006): Limitations of the Local Lymph Node Assay (LLNA) as preferred test for skin sensitisation: concerns about false positive and false negative test results, TNO report V7217).

CESIO would appreciate if this report were included in the ICCVAM evaluation process of the LLNA.

CESIO has encouraged its membership to submit data discussed in the Penninks (2006) review to NICEATM.

Yours sincerely,

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(originally signed – sent electronically)

