

Dear Sir or Madam:

Please find attached my comments on the above referenced Workshop Report and Guidance Document.

Thank you for providing this opportunity for public commentary.

Linda Whitenton

"October 20, 2001

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

Re: Report of the International Workshop on In Vitro Methods for  
Assessing Acute Systemic Toxicity

Dear Director Stokes:

Thank you for the opportunity you have afforded for public commentary on the above-referenced Report.

I would respectfully like to make the following comments:

1. I recommend that the National Institute of Environmental Health Sciences adopt the new non-animal testing methods covered at the International Workshop immediately. Some of these testing methods have been under consideration, scrutiny and validation for nearly twenty years, and I believe the time has come to put them into practice.
2. I recommend that government agencies use in vitro cell culture tests to completely replace the use of whole animals in lethal dose tests, not just to establish a starting dose for in vivo testing.
3. I recommend that at a minimum, all government agencies currently requiring acute animal poisoning studies immediately incorporate the in vitro cell culture method as a transitional means of reducing numbers of animals killed, and further, that they should fully support this method's use as an eventual replacement for lethal-dose poisoning studies. I would further urge that the EPA in particular immediately incorporate the non-whole animal cell culture method into its High Production Volume chemical program.

I appreciate the opportunity given for public commentary on this matter, and sincerely thank you for your time in reviewing this comment.

Respectfully,

Linda J. Whitenton  
Private citizen"