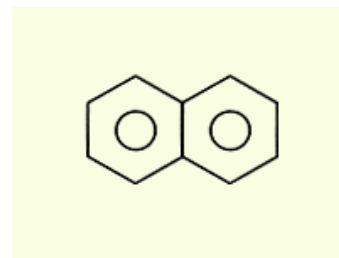


NAPHTHALENE COUNCIL, INC.



September 18, 2006

Dr. C.W. Jameson
National Toxicology Program
Report on Carcinogens
79 Alexander Drive
Building 4401, Room 3118
P.O. Box 12233
Research Triangle Park, NC 27709

Re: Naphthalene Council's Comments on "National Toxicology Program (NTP); Report on Carcinogens; Proposed Review Process for the 12th Report on Carcinogens (RoC): Request for Public" (71 Fed. Reg. 47507 (August 17, 2006)).

Dear Dr. Jameson:

On August 17, 2006 the above referenced notice was published in the Federal Register, soliciting comments on the NTP's proposed review process for the 12th RoC. This letter contains the comments of the Naphthalene Council, Inc. (Council) in response to the August 17 notice.

The Council represents active and legacy manufacturers, importers and users of naphthalene or naphthalene-containing substances. In light of the irregularities that occurred during consideration of listing naphthalene in the 11th RoC¹, Council members have a vital and continuing interest in changes that may improve the RoC listing and delisting process.

The Council commends NTP for this initiative to make the RoC listing process more transparent and open to the input of expert scientists, and fully endorses the comments submitted by the American Chemistry Council regarding the proposed review process. In particular, the Council believes that the proposal to enhance the science review process for each substance nominated for listing or delisting through addition of the Expert Panel review step will improve the scientific foundation for NTP's listing decisions.

The Council appreciates the opportunity to provide comments on the proposed RoC review process. Please contact me if you have any questions.

Sincerely,

<Signed>

Anne P. LeHuray, Ph.D.
Executive Director

¹ See Information Quality Act Request for Correction, dated April 1, 2004 and available on line at <http://aspe.hhs.gov/infoquality/requests.shtml>.