



National Institutes of Health
National Institute of
Environmental Health Sciences
NTP Interagency Center for the Evaluation
of Alternative Toxicological Methods
P. O. Box 12233
Research Triangle Park, NC 27709
<http://iccvam.niehs.nih.gov>

September 18, 2008

Dr. Jerry Smrchek
U.S. National Coordinator for the
OECD Test Guidelines Program
U.S. Environmental Protection Agency
Ariel Rios Building
1200 Pennsylvania Avenue, NW
Mail Code 7403M
Washington, DC 20460

Dear Dr. Smrchek,

On behalf of the Interagency Coordinating Committee on the Validation of Alternative Methods (ICCVAM), we are pleased to provide the enclosed table of comments on the proposed draft OECD document, *The Threshold Approach for Acute Fish Toxicity Testing*. These comments are in response to the July 8, 2008 notification from OECD requesting comments on the draft document.

As you can see, ICCVAM's primary concern relates to the probability calculations included in the proposed approach, and the confidence intervals generated for the underlying probability. Accordingly, there may be the need for incorporation of a factor above the actual threshold concentration when the decision not to carry out further fish testing is made.

We appreciate the opportunity for ICCVAM to provide comments on this draft document. Please feel free to contact us at any time if you have questions or concerns regarding these comments.

Sincerely,

William S. Stokes, D.V.M., D.A.C.L.A.M.
RADM, U.S. Public Health Service
Director, NICEATM
Executive Director, ICCVAM
National Institute of Environmental
Health Sciences

Marilyn L. Wind, Ph.D.
Chair, ICCVAM
Deputy Associate Executive Director
Directorate for Health Sciences
U.S. Consumer Product Safety
Commission

Enclosure