

14 August 2007

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 comments on the proposed draft OECD Test Guideline (TG) for the Stably Transfected Transcriptional Activation (STTA) Assay for Detecting Estrogenic Activity of Chemicals. These comments are in response to the 20 July 2007 notification from the OECD requesting comments on the draft TG.

We concur with the technical comments and suggested modifications made by the Peer Review Panel (PRP) in the OECD Summary Report of the PRP for the draft STTA TG. In particular, we agree that the draft TG is incomplete and needs considerable revision, especially regarding the lack of a clear definition for a positive response and insufficient guidance on the criteria for acceptable test performance. Because of these deficiencies, we cannot agree with the PRP's conclusion that the test guideline is sufficiently detailed to permit others to perform the assay.

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