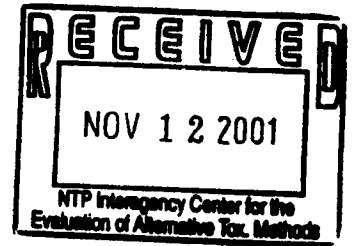


November 11, 2001



Dr. William Stokes, Director  
NICEATM (MD EC-17), NIEHS  
PO Box 12233  
Research Triangle Park, NC 27709  
Facsimile (919) 541-0947

Dr. Stokes:

I ask you to completely replace the lethal dose testing with non-animal, in vitro testing methods.

Although I have never used the LD-50 testing methods, I did use LC-50 testing in an environmental laboratory, where I worked after I graduated from college. I consider that test inhumane to the fish I was testing, and above all, unreliable. One obvious example was when we tested motor oil with the LC-50 test. Motor oil is a toxic substance obviously, but because the test was only administered for 72 hours, and we could pump in oxygen into the fish tanks, we were able to keep the fish alive (only to grind them up in a garbage disposal after their death-defying ordeal). What exactly did that test prove? Is it really okay to pollute the environment with motor oil? We all know that it's not.

My only point is that some of the USEPA-approved tests we are using now (the LD-50 test for one) are outdated. There are more reliable tests available to use and it's time we start using them. It's time we begin phasing in the non-animal, in vitro testing methods.

Sincerely,

Maria Wirtz