

**From:** Tony Madsen  
**Sent:** Monday, December 13, 2004 9:53 PM  
**To:** NIEHS ICCVAM  
**Subject:** Dear ICCVAM

1. ICCVAM should follow the example set by European countries that accept the results of these *in vitro* methods, alone or in combination, to classify severely irritating and corrosive chemicals, and should eliminate proposals for “confirmatory” testing on animals.
2. ICCVAM’s background-review documents should clearly address the limitations of the current animal test for eye irritation, including its subjectivity, reproducibility, and its over- and under-prediction rate. ICCVAM should not presume to “validate” a non-animal method against an animal test that has never been properly validated itself.
3. ICCVAM should take the time to learn that these tests are being used safely and effectively by the industry today.
4. ICCVAM should stop dragging its heels and setting up obstacles to the acceptance and use of non-animal test methods in the U.S.

Sincerely,  
Tony Madsen  
Miami, FL