

June 15, 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 attached comments on the proposed draft OECD Test Guideline (TG) "The Hershberger Bioassay in Rats." These comments are in response to your 12 April 2007 notification that the OECD requested comments on the draft TG.

Comments regarding a number of technical considerations are identified by the TG paragraph number relevant to that comment. Also included is a general comment stating that, based on the validation database, the Hershberger test method has not been adequately validated for its intended purpose, as required by OECD GD 34.

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.