

6 August 2007

Dr. Jerry Smrchek
U.S. National Coordinator for the
OECD Test Guidelines Program
U.S. Environmental Protection Agency
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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 Draft Updated Test Guideline (TG) 407, "Repeated Dose 28-Day Oral Toxicity Study in Rodents." These comments are in response to your 16 May 2007 notification that the OECD requested comments on the draft TG.

We concur with the technical comments made by the Peer Review Panel (PRP) provided in the OECD Summary Report of the PRP for the Updated TG 407 and we have included additional comments regarding technical considerations that were not specifically discussed in the PRP report. Also included are general comments regarding the rationale for the updated TG, and comments stating that the validation effort for the test method was compromised by not using coded test substances and not adequately demonstrating intra laboratory reproducibility.

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.