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**From:** Ken Bogen Ex. 6  
**Sent:** 5/15/2018 4:42:19 PM  
**To:** Chiu, Weihsueh A [wchiu@cvm.tamu.edu]  
**CC:** drsg-l@indiana.edu; terje.aven@uis.no; Margaret MacDonell [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=usere705e15d]  
**Subject:** Re: [DRSG] FYI - comment on proposed EPA rule "Strengthening Transparency in Regulatory Science"  
**Attachments:** Comment on Proposed Rule.pdf

**Importance:** High

Weihsueh et al.,

I heartily endorse your proposed comment on behalf of DRSG. Your comment might be strengthened by adding additional DRSG Board co-signatories, and I volunteer to add my co-signature if you agree with this recommendation.

In addition, I recommend augmenting the current sentence

Specifically, the "Dose-Response Specialty Section" [sic] of the Society for Risk Analysis does not have any "policies or recommendations" on this topic.

to instead read

Specifically, the "Dose-Response Specialty Section" [sic] of the Society for Risk Analysis has never adopted any "policies or recommendations" on this or any other topic (see <http://www.sra.org/drsg>). Rather, the purpose of the Dose-Response Specialty Group (DRSG) of the Society for Risk Analysis (SRA) is to "facilitate the exchange of ideas and knowledge among practitioners, researchers, scholars, teachers, and others interested in dose-response assessment, to encourage collaborative research on dose-response assessment, and to provide leadership and play an active role in advancing issues related to dose-response assessment" ([http://www.sra.org/sites/default/files/u35/DRSG\\_by-laws.pdf](http://www.sra.org/sites/default/files/u35/DRSG_by-laws.pdf)). EPA never solicited DRSG input concerning EPA's proposed "Strengthening Transparency in Regulatory Science" rule, so it is inaccurate and misleading for this rule to state or imply any DRSG endorsement of or concurrence with that proposed rule.

Ken

Kenneth T. Bogen, Dr.P.H., DABT  
Past-Chair, SRA Dose-Response Specialty Group

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On May 15, 2018, at 10:24 AM, Chiu, Weihsueh A <[wchiu@cvm.tamu.edu](mailto:wchiu@cvm.tamu.edu)> wrote:

Dear DRSG Members,

I am planning on submitting the attached public comment on EPA's proposed rule "Strengthening Transparency in Regulatory Science." Specifically, the Proposed Rule inaccurately suggests that the

DRSG has official policies or recommendations on this topic. The comment is simply for EPA to remove reference to the DRSG from the final rule.

Let me know if you have any concerns or comments by the end of the week (Sunday 5/20). Thanks!

Regards,  
Weihsueh

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