

October 3, 1967

O. G. Fitzhugh, Ph.D.
Toxicological Advisor
Division of Toxicological Evaluation
Department of Health, Education, and Welfare
Food and Drug Administration
Washington, D.C. 20204

Dear Doctor Fitzhugh:

Thanks for your letter of September 28. I am quite content, for the present, to have your approval of the protocol which I submitted. I fully understand your reluctance to accept it as sufficient, in itself, to provide the answers to the questions at issue. I had thought, however, that I had made it clear to you that no such blanket approval was being sought. I hardly think that your views and mine would differ strikingly as to the type of information that should be obtained in an inquiry into this matter. Perhaps, we might disagree as to the interpretation of a set of findings, in their relation to the degree of risk entailed in the use of these products, but I think we can and should exchange views with the utmost frankness.

I do not minimize your responsibilities and those of your agency, and I appreciate fully your need of being cautious. However, I too have responsibilities as a physician, and I don't believe I have ever lost sight of the functions of a physician in the course of an investigation. If indeed the lead compound is not absorbed appreciably, through the scalp, these products can, I believe, be so handled as to avoid danger. It remains to be proved, however, that under the conditions of their common use, this can be accomplished. The record of their use seems to indicate that such is the case, but this can be tested, I believe, by relatively simple means. I shall wish to bring such means to your attention after we shall have passed the first hurdle.

Cordially yours,

Robert A. Kehoe, M.D.
Professor Emeritus of
Occupational Medicine

RAK:wp