February 3, 1975

Dr. Donovan Gordon
Industrial Bio-Test Laboratories

I wish to summarize my observations of the lesions seen in Dr. Kimbrough's study of Aroclor 1260 and the comparison of diagnoses with Dr. Kimbrough and Dr. Squire.

1.) The criteria that I used for diagnosis of the lesions are similar to what they used.

2.) My evaluation tends to be a little more conservative than theirs. For example: they would call some of my hepatomas carcinoma but with some question.

3.) Therefore, if we both read the same slides there might be a little variation in numbers of lesions in the different categories but no major difference.

4.) Dr. Squire and Dr. Kimbrough are using a new and revised terminology for the categories and list them as follows:

My Terminology (Classical Use)	Dr. Squire's (Revised Terminology)
Focal Hypertrophy	Cellular Alteration
Nodular Hyperplasia Hepatoma	Nodular Neoplasia or Neoplastic Nodule
Carcinoma	Carcinoma

5.) However, the lesions in Dr. Kimbrough's study were more severe than those in the Bio-Test study. The lesions that she and Dr. Squire are calling carcinoma are also carcinomas by my criteria. I would

MONS 095602

conclude from an examination of their material that Dr. Kimbrough's study demonstrated carcinogenicity.

Ward R. Richter

Ward R. Richter, D.V.M.
Dipl. Am. College Vet. Path.