



American Society for Investigative Pathology
Investigating the Pathogenesis of Disease

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May 17, 2018

Scott Pruitt
Secretary
Environmental Protection Agency
1200 Pennsylvania Ave., NW
Washington D.C., 20460

U.S. Environmental Protection Agency
EPA Docket Center, EPA-HQ-OA-2018-0259
Mail Code 28221T
1200 Pennsylvania Ave., NW
Washington DC 20460

Attn: Doc. No. EPA-HQ-OA-2018-0259

Re: *Request for extension of the comment deadline for Proposed Rule: Strengthening Transparency in Regulatory Science*, 83 Fed. Reg. 18,768 (Apr. 30, 2018)

Dear Administrator Pruitt,

The American Society for Investigative Pathology respectfully requests a 60-day extension of the comment deadline on the Proposed Rule *Strengthening Transparency in Regulatory Science*, 83 Fed. Reg. 18,768 (Apr. 30, 2018). The American Society for Investigative Pathology (ASIP) is a nonprofit educational 501(c)(3) organization primarily representing the academic pathology research community. We are a society of biomedical scientists who investigate disease, linking the presentation of disease in the whole organism to its fundamental cellular and molecular mechanisms. Our society represents approximately 1,000 physicians and doctoral scientists who perform or are involved with pathology research in academic medicine, government, and private industry.

Your administration has currently set the comment deadline for May 30, 2018, allowing only thirty days to comment. Thirty days is clearly an inadequate amount of time to allow stakeholders, including the biomedical research community, to evaluate this proposal and to submit substantive comments and feedback. The proposal has potentially far-reaching implications for EPA's treatment of science and the agency's ability to protect human health. ASIP is currently evaluating the effects that this regulation may have, especially given the high stakes involved and the potential that such regulatory changes may cause substantial harm. A thorough evaluation of such a far-reaching proposal includes assessing the immediate impact that such a regulation may have on past and current research, as well as assessing the effects that the NPRM may have on future research. ASIP is deeply concerned about respectful and ethical treatment of human subjects and a review of the NPRM proposal as it interfaces with existing legal and regulatory requirements deserves thoughtful consideration and thus additional time is required. Accordingly, it is vital that stakeholders be allowed more time to thoughtfully consider the effect of this proposal and that EPA convene a public hearing to air key issues.

The proposed action, aimed at the heart of EPA's science-based decision-making, clearly merits a 90-day public comment period. Executive Order 12,866 indicates that a 60-day comment period is the minimum necessary to afford the public a meaningful opportunity to comment, and here, where foundational and complex issues are at stake, a significantly longer comment period is appropriate.

Accordingly, the American Society for Investigative Pathology respectfully requests that extend the comment deadline to allow for meaningful community engagement. Thank you for the opportunity to submit these comments. If ASIP may be of further assistance, please contact Dr. William B. Coleman at wbcoleman@asip.org.

Sincerely,

William B. Coleman, PhD
Executive Officer