



Rodenticide Registrants Task Force

Bergeson & Campbell, P.C.
1203 Nineteenth Street, N.W.
Suite 300
Washington, D.C. 20036-2401
Tel: (202) 557-3800
Fax: (202) 557-3836

October 4, 2004

Via E-Mail

Debra F. Edwards, Ph.D.
Director, Special Review and Reregistration Division
Office of Pesticide Programs
Registration Division, MC: 7508C
Ariel Rios Building
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460

Re: Extension Request by the Rodenticide Registrants Task Force for
Comments on the Revised Comparative Ecological Risk Assessment

Dear Debbie:

This letter is submitted on behalf of the Rodenticide Registrants Task Force (RRTF) to request an extension of time to comment on the revised comparative ecological risk assessment and related documents the United States Environmental Protection Agency (EPA) made available on September 22, 2004. Comment is now due on November 22, 2004. The RRTF seeks an additional 60 days within which to provide comment.

Additional time is needed for the RRTF to have an adequate opportunity to comment. The time is necessary to allow an adequate review of the revised comparative ecological risk assessment, which is over 200 pages in length and contains many references to other documents and data points, each of which must also be reviewed. Additionally, because the comparative ecological risk assessment involves nine different registered rodenticides, considerable time is required just to coordinate the schedules and availability of each of the registrants involved in this important matter. The RRTF does not understand there to be any statutory or other mandated deadline, so this extension will not interfere with any legal requirement. The RRTF also believes additional time will enhance the quality and utility of the comment the RRTF provides to EPA, and, as stated above, is essential for the RRTF to have an adequate comment opportunity.



Debra F. Edwards, Ph.D.
October 4, 2004
Page 2

Please let us know at your earliest convenience if the request is granted so we can advise our members accordingly. Your assistance is appreciated.

Sincerely,

John L. Hott

John L. Hott, Ph.D.

cc: Ms. Linda Keola P. Murray (via e-mail)
Mr. George T. Myers (via e-mail)