

Circle No. 278 on Readers' Service Card

the justification for pesticide cancellations. The only rational decisionmaking process is one which will balance costs versus benefits and utilize scientific data as a basis for pesticide policy.

It was with this goal in mind that Congress passed legislation amending the Federal Insecticide, Fungicide, and Rodenticide Act to require EPA to prepare and file statements on the impact of pesticide decisions on the agricultural economy, the supplies of food and fiber, and consumer food prices. Since this requirement can only act to benefit all Americans, it would seem to refute Carter's implication that Congress bowed to the agricultural lobby. It is more likely that special interest groups have had an undue influence on the three EPA lawyers, who admit turning to environmental groups for guidance and assistance in their policy-making efforts. The transfer of pesticide decisions back to the OPP should rectify this problem by putting the decisions back in the hands of scientists, who will base their decisions on scientific evidence rather than emotionalism.

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In response to the suggestion that I have engaged in "journalistic sensationalism." I merely point out that the resignation of the three attorneys—made in protest at what they perceived to be a bad turn in EPA policy—was in fact highly unusual, or, if you will, "sensational." Furthermore, I said quite plainly that the merits of their criticism of the organizational and policy changes at EPA must be judged later in light of how well or badly these changes work out in practice.

By insisting that I should have described the dilemma inherent in pesticide regulation, Engler really seems to mean that I should have emphasized how difficult it is for scientists in the Office of Pesticide Programs (OPP) to arrive at judgments on which regulatory decisions can be based. He shows little interest in the other horn of the regulatory dilemmathe necessity of protecting people and the environment from possibly harmful chemicals, even though the evidence as to their effects may be incomplete or ambiguous. When this dilemma is not squarely faced, the result is regulatory paralysis.

Baize speaks highly of Edwin Johnson, the current head of the OPP, and seems to imply that my article puts him in a bad light. The fact is, Johnson, whose predecessor was transferred for failing to deliver, was only mentioned in order to point out that Administrator

Russell E. Train has told him that the OPP is now on its mettle to "move ahead aggressively."

Baize also refers to my "implication that Congress bowed to the agricultural lobby." What I wrote was that, at the urging of chemical industry and agricultural interests, the House of Representatives came within only a few votes of adopting an amendment that would have gutted the Federal Insecticide, Fungicide, and Rodenticide Act by giving the Secretary of Agriculture an effective veto over the EPA administrator's decisions.—LUTHER J. CARTER

ESCA Systems

I wish to commend Arthur L. Robinson for the comprehensive nature of his article "Surface analysis: Multiple techniques for monolayers" (Research News, 26 Mar., p. 1255). However, there are some errors in the section on electron spectroscopy for chemical analysis (ESCA). Robinson notes that prices for ESCA instruments range from about \$110,000 to more than \$350,000 for our most complex machine. Much as we at AEI would like to be able to charge \$350,000 for an ESCA system, we do appreciate that this is a highly competitive world and that such a price would severely limit our sales.

In fact our basic working ESCA system is priced at less than \$100,000, and our most complicated system, including every available accessory, costs approximately \$230,000.

One of the main accessories for an ESCA machine is the ultraviolet source; while Robinson singles out two other manufacturers as the only suppliers of this accessory, we have been a supplier for some years.

Finally, the availability of a monochromatic source on the AEI machine is a point of sufficient uniqueness to warrant some comment.

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Protection of Archeological Sites

I would like to clarify a statement made by Rhodes W. Fairbridge in his article "Shellfish-eating Preceramic Indians in coastal Brazil" (30 Jan., p. 353). Fairbridge states that "although shell middens are theoretically protected by law in both Brazil and the United States,