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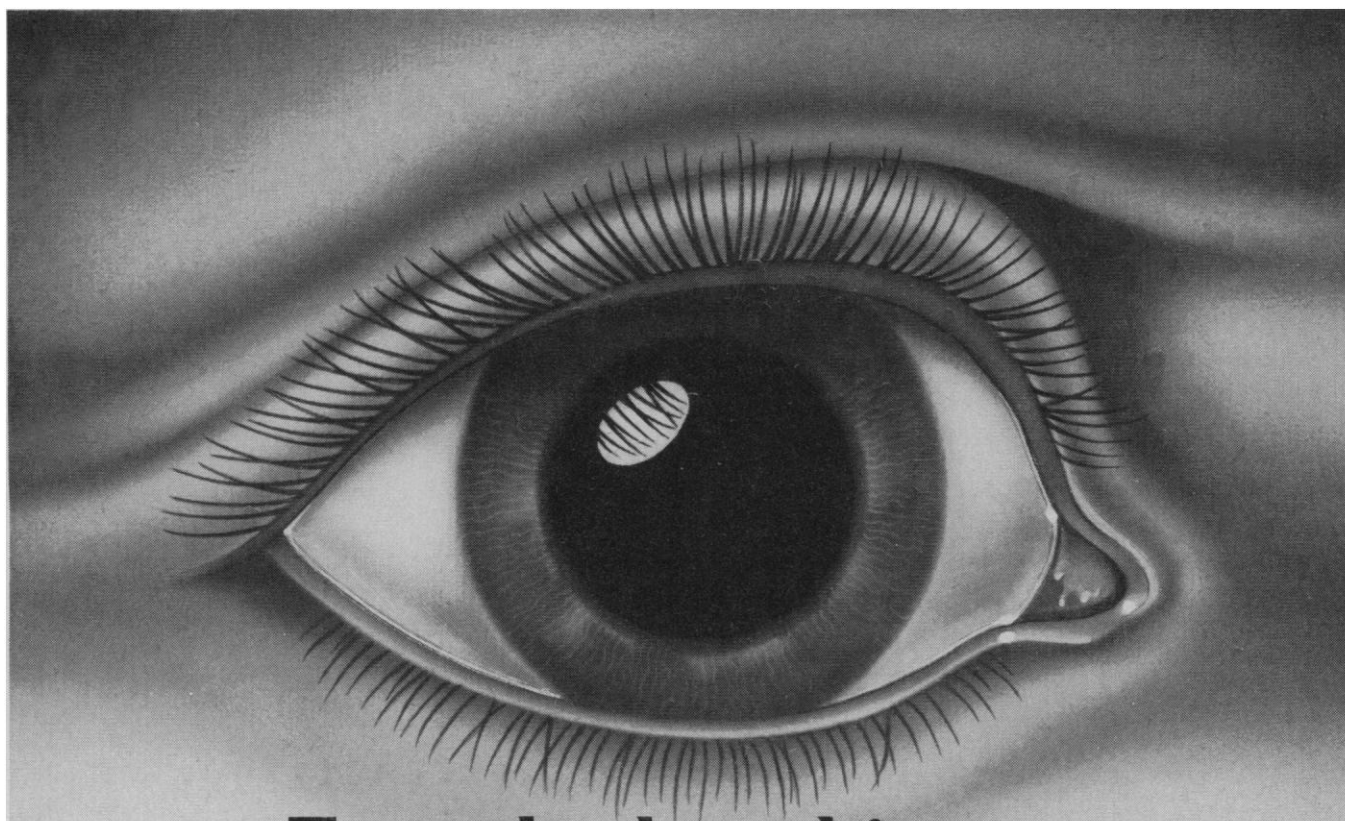
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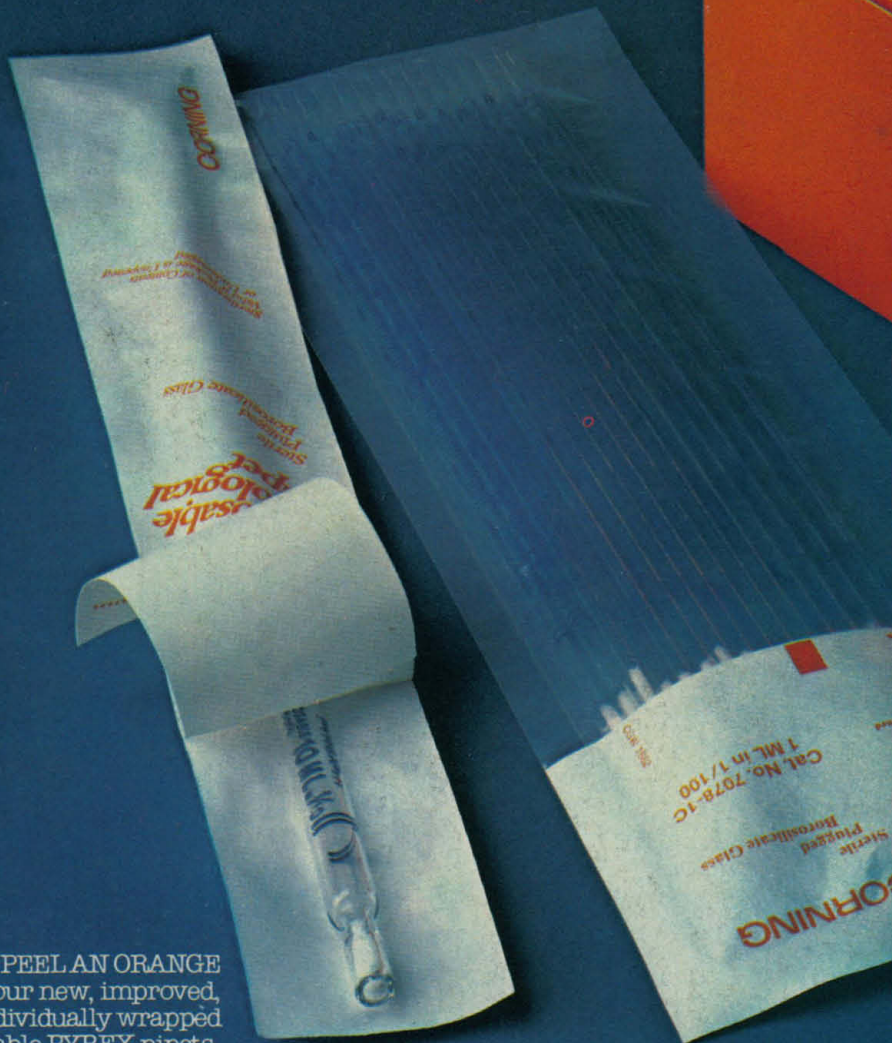
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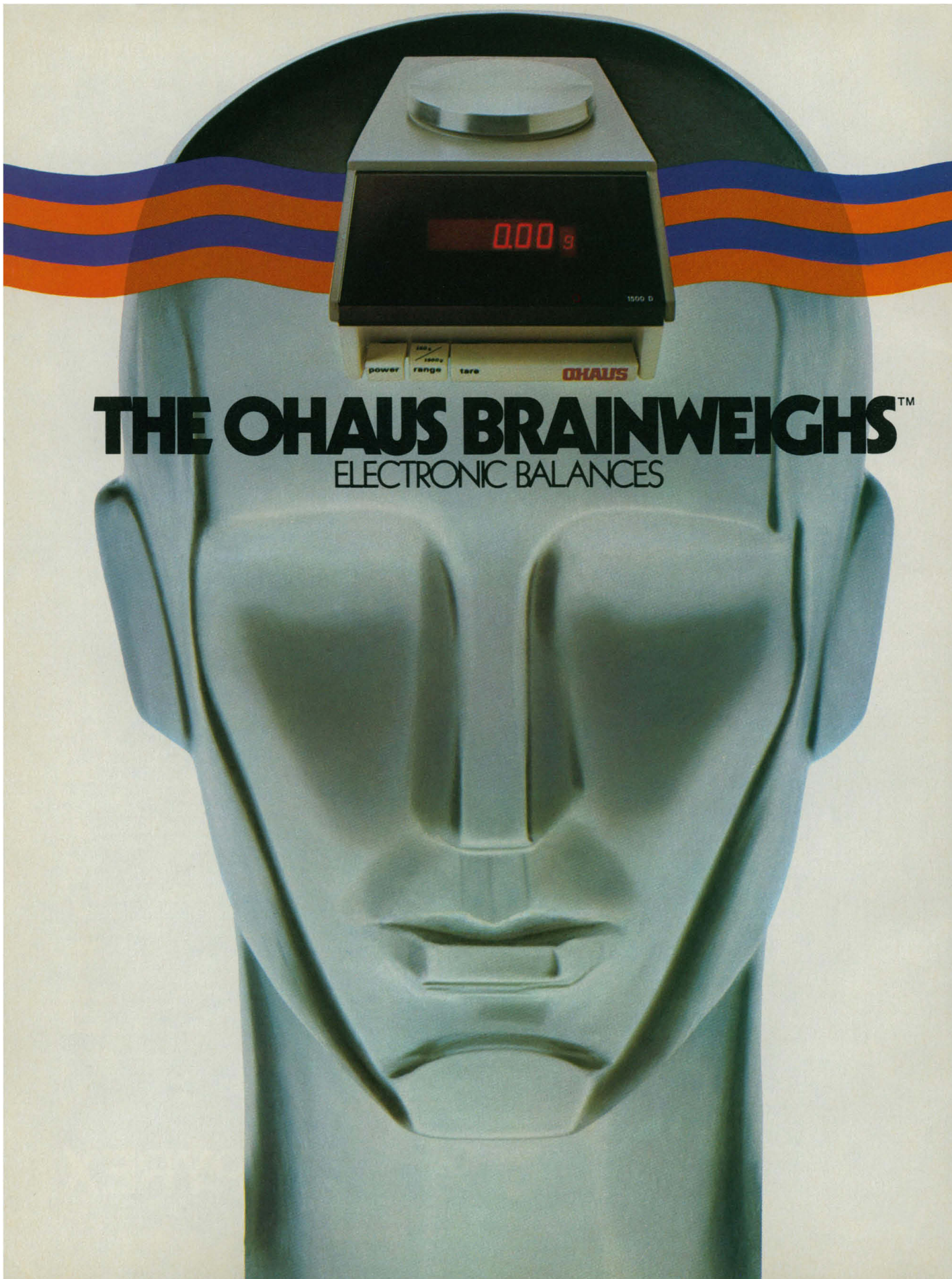


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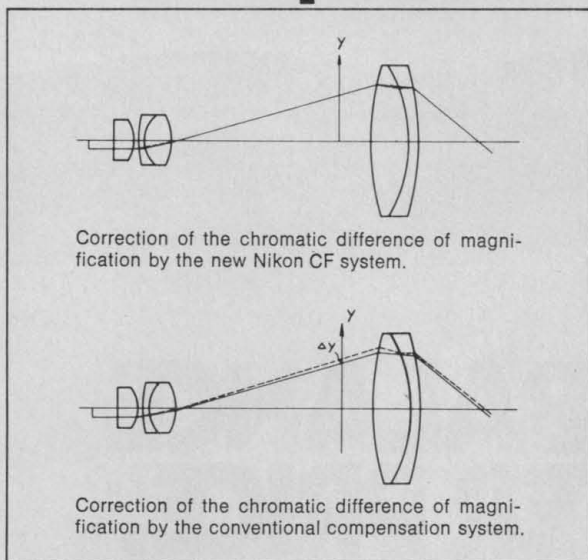
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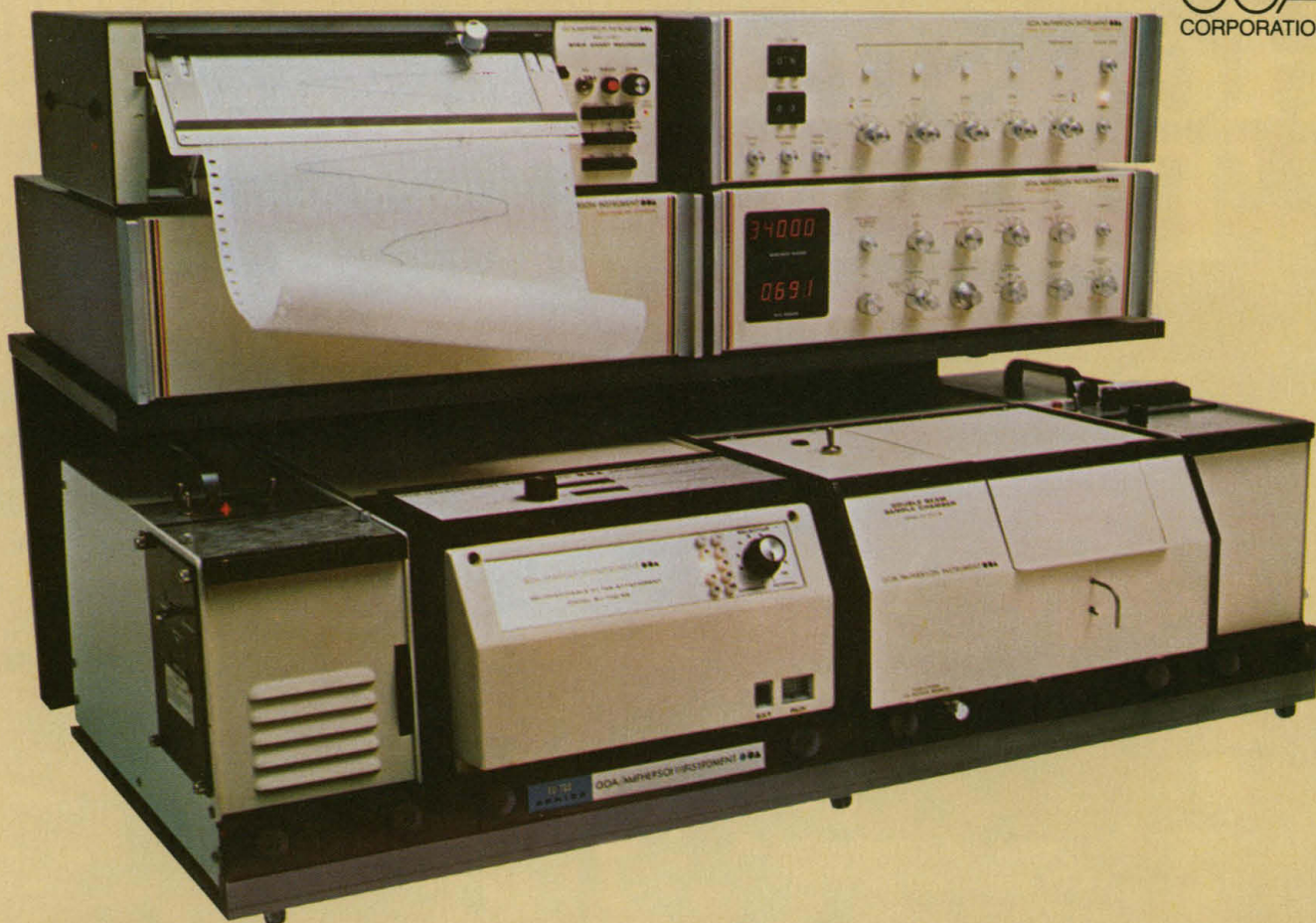
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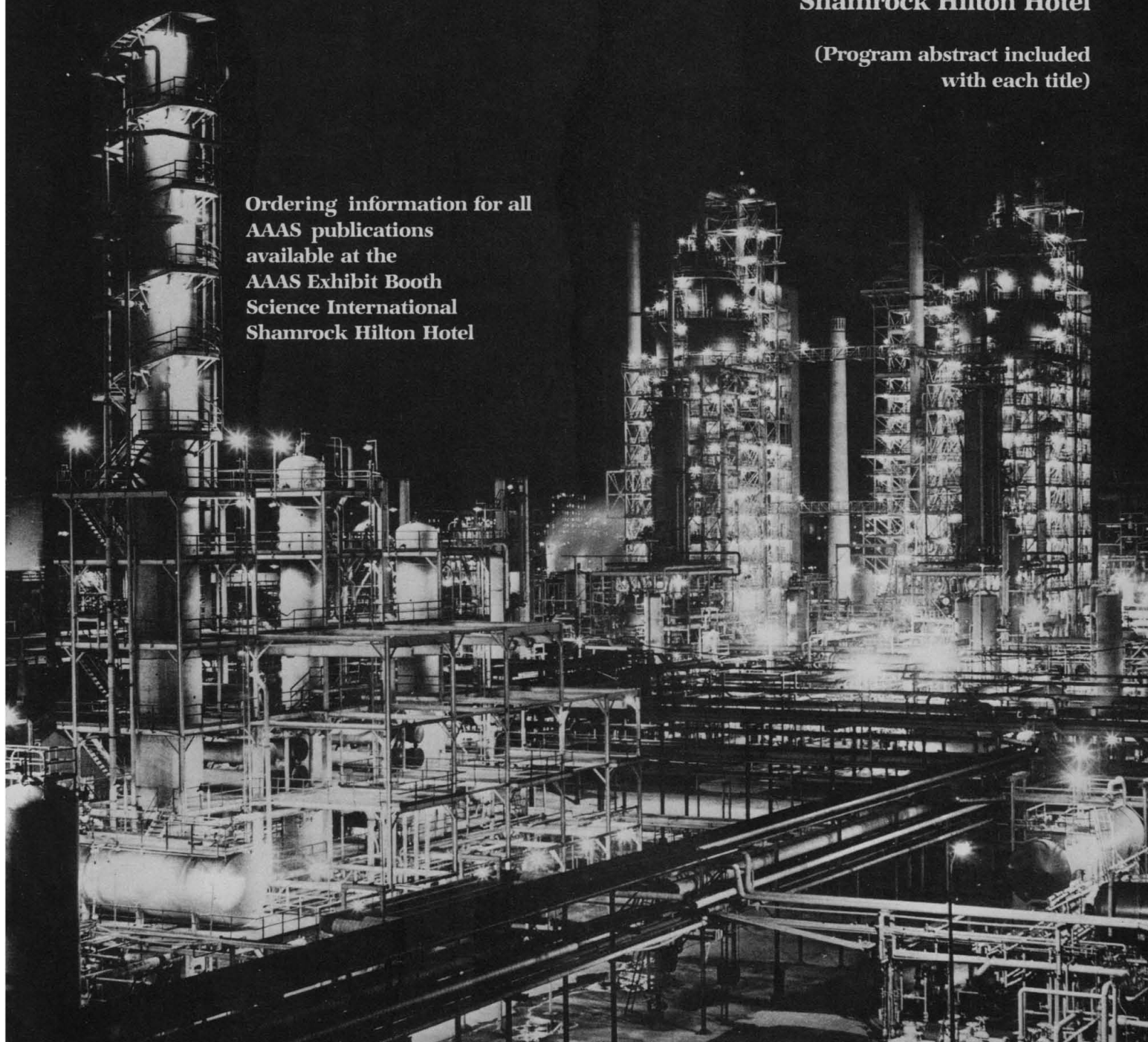


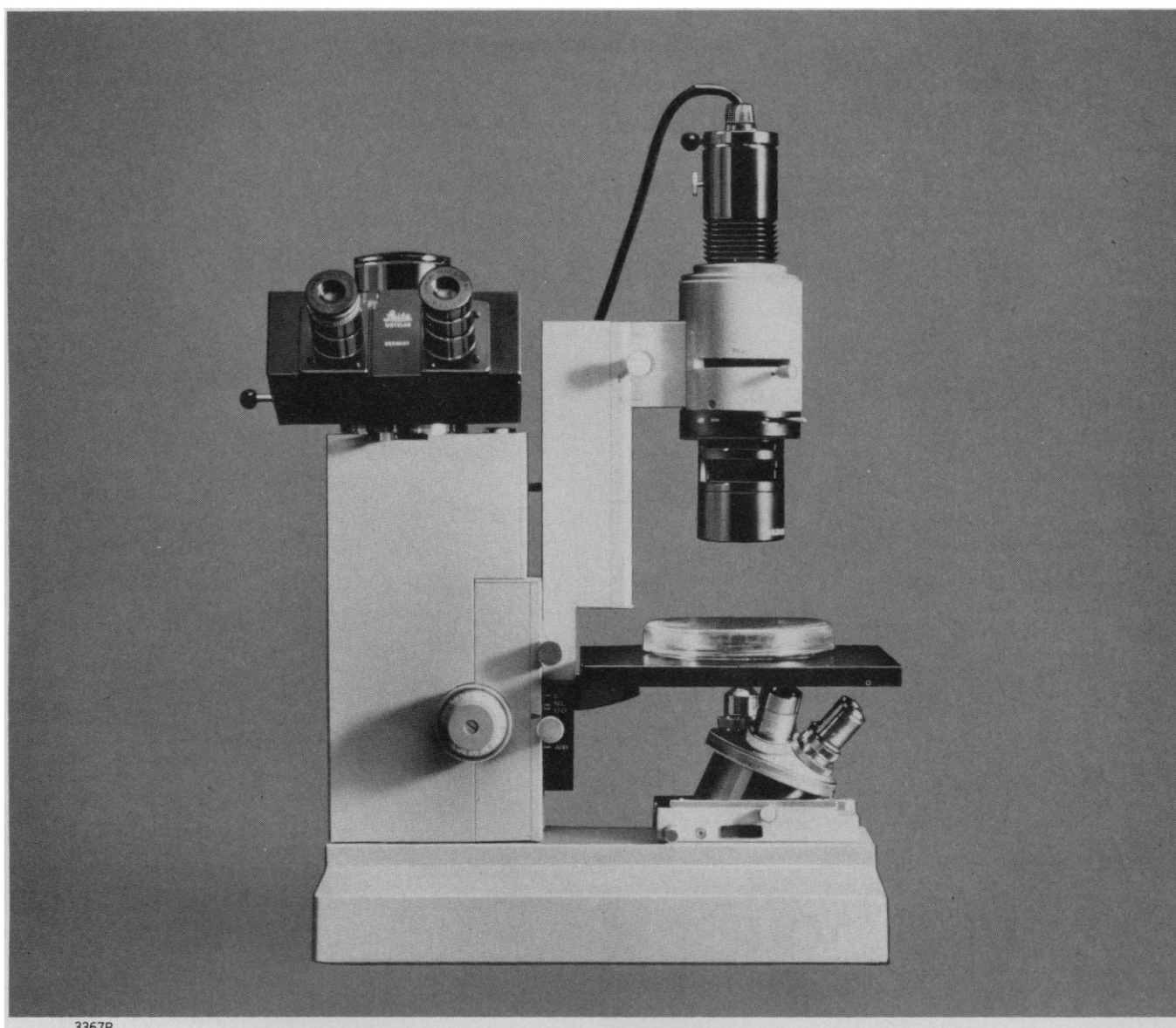
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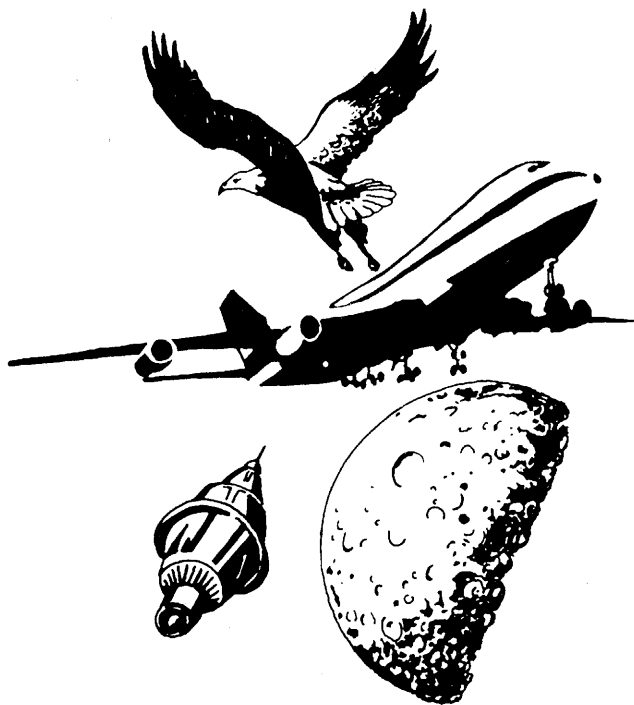
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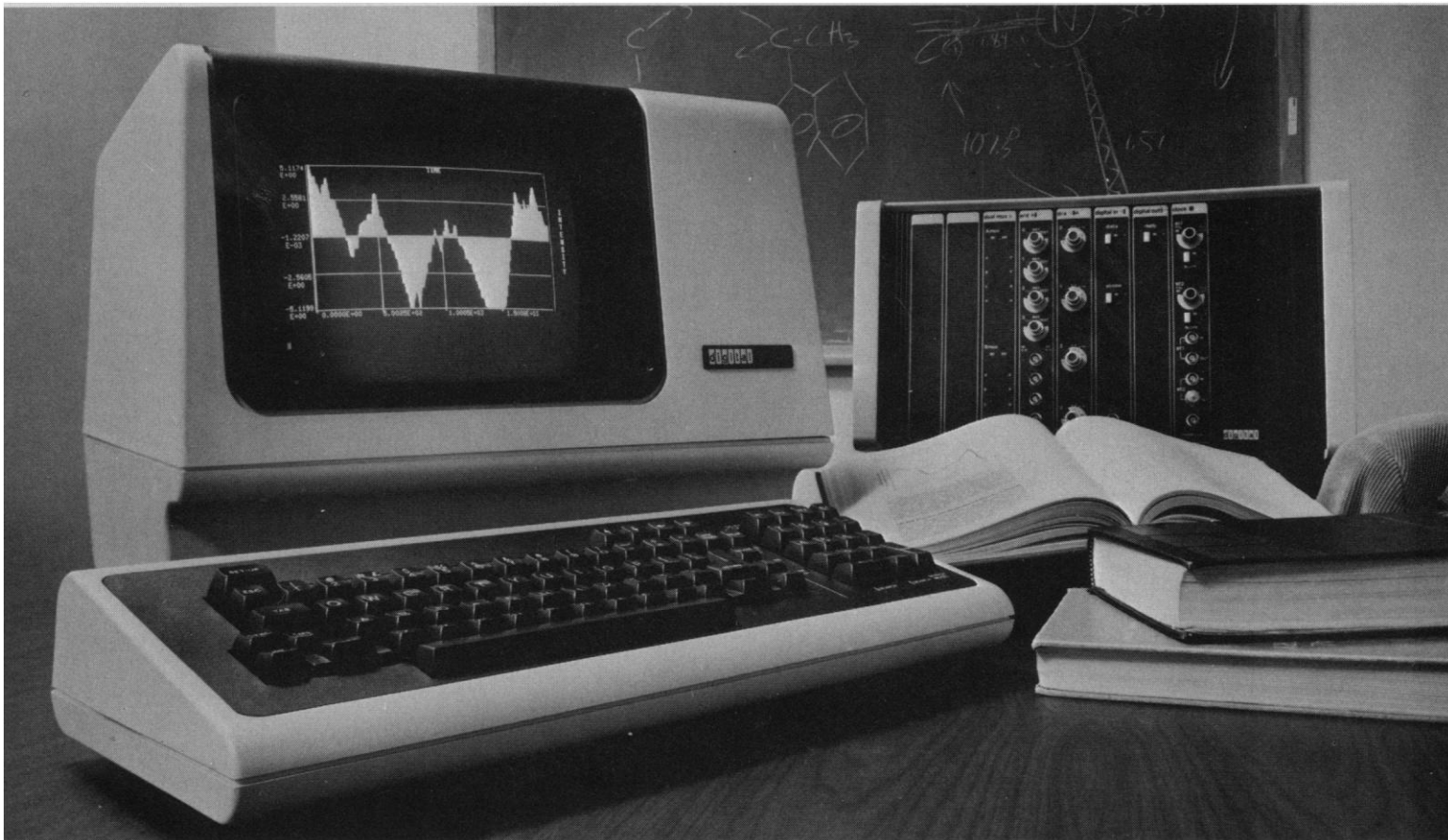
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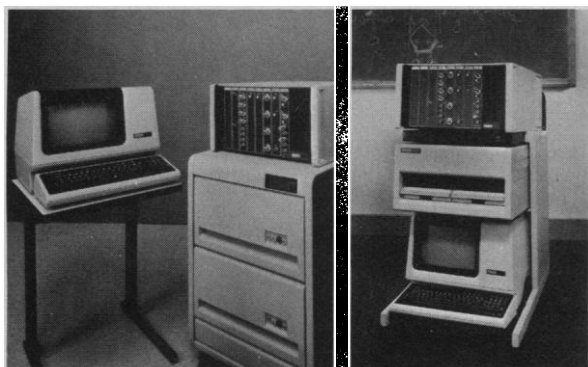
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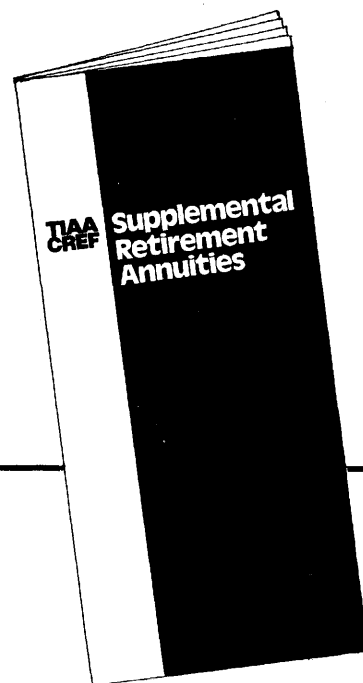
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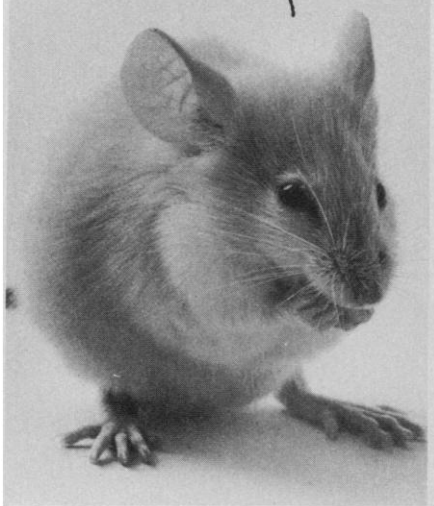
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LETTERS

Technological Innovation

I was extremely interested in William D. Carey's editorial "Science in the political economy" (17 Nov. 1978, p. 703). I agree with the assessment that the budget restraints we are facing make it critical that the money spent by the federal government for research and development bring the greatest possible return. Not only should we be selective in our research funding, but we must also create the best climate for bringing the fruits of federal research to the people in the form of new products and technology. Unfortunately, the present policy of federal government retention of patent rights on inventions arising out of federally supported research has resulted in many promising inventions being left to gather dust on the shelves of government agencies. Less than 4 percent of the patents held by the government are ever successfully licensed. This is not a very good return for the billions of dollars we spend on R & D.

There is another trend that has been commented upon in the past in *Science* and is succinctly expressed by this headline, which appeared in the *Washington Post* on 24 November 1978: "U.S. Seen Losing Technological Edge in Some Industries." Because the government provides such a large percentage of all the R & D expenditures in the United States, an inefficient policy which stifles inventiveness hurts our companies who need new technological ideas to compete successfully with increasingly tough foreign businesses.

In the last Congress, I joined a bipartisan group of senators in introducing a bill we feel will answer at least part of these problems. This legislation, the University and Small Business Patent Procedures Act, will allow universities, small businesses, and nonprofit institutions in most cases to retain patent rights for those inventions and processes if they are willing to spend the necessary private funds to develop and market a final product. At the same time, the bill will protect the legitimate rights of the government to enjoy the fruits of the research it helped to fund.

There are now 20 statutes and regulations in effect that give contradictory instructions to the agencies about their ability to grant patent petitions. Sometimes, even within the same agency, there can be different policies among various divisions. The result has been that researchers face a costly maze of confusing rules, many of which require the agency that helped fund the research

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to also retain the patent rights for any inventions arising from it.

Early in the next Congress, Senator Robert Dole (R-Kan.) and I again will lead the bipartisan effort to pass this legislation. I realize that getting the most out of our R & D money and the problem of our slumping rate of technological innovation are extremely complex areas. This bill would be an important first step in turning this situation around.

BIRCH BAYH

U.S. Senate, Washington, D.C. 20510

Nitrite in Cured Meats

Philip E. Hartman (Letters, 20 Oct. 1978, p. 260) responds to the article by R. Jeffrey Smith (News and Comment, 8 Sept. 1978, p. 887), which says researchers have estimated that less than 20 percent of the nitrite entering the human stomach is derived from cured meats. Hartman cites a publication by White (1) giving a figure of 21.2 percent and considers this the best currently available information. On the basis of White's estimate that cured meats contribute 9.4 percent of ingested nitrate and other evidence that some of the dietary nitrate is absorbed by the body, secreted in the saliva, and then reduced to nitrite in the oral cavity, Hartman suggests that the nitrate in cured meats may "possibly contribute an additional 6.8 percent of gastric nitrite." Adding this figure to White's value of 21.2 percent, Hartman obtains a total of 28 percent.

Hartman's estimate appears to be too high. The data on which it is based overestimate the current exposure to nitrite and nitrate in cured meats because they are based on analyses of cured meat samples taken years ago. Nitrite and nitrate residues in cured meats are now reduced because of recent changes in manufacturing practices.

S. R. Tannenbaum *et al.* (Reports, 30 June 1978, p. 1487) found that nitrite and nitrate are formed in the human intestinal tract. Hence, the human body as a whole is exposed to more nitrite- and nitrate-nitrogen than enters the stomach from the oral cavity. On the basis of the data by White and Tannenbaum *et al.*, I estimated (2) that as much as 2 percent of the exposure of humans to nitrite in the United States is a consequence of consumption of meats cured with nitrite. The remaining 98 percent of the exposure is from other sources, which seem to be almost exclusively dietary nitrogenous substances other than nitrite that undergo transformation in the digestive tract with production of some ni-

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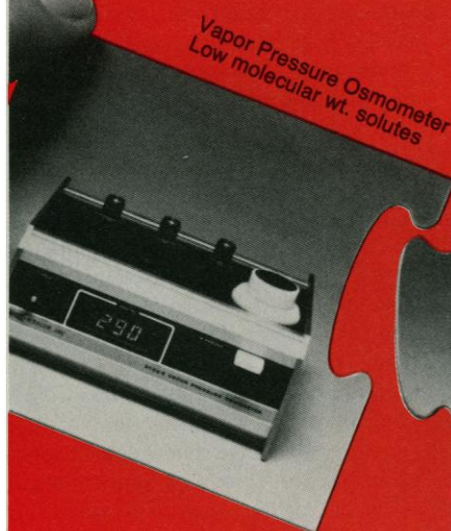
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trite. I pointed out that the very small reduction in total hazard from nitrite that could be achieved by eliminating its use in meat curing must be balanced against (i) the increase in hazard from botulism, should the meat continue to be handled as at present, (ii) the increase in cost if all the meat now containing nitrite were to be handled as fresh meat, and (iii) the loss of value to consumers who would be unable to purchase the cured meats they desire.

CHARLES A. BLACK
*Council for Agricultural Science and
Technology, Iowa State University,
Ames 50011*

References

1. J. W. White, Jr., *J. Agric. Food Chem.* **24**, 202 (1976).
2. C. A. Black, "COMMENTS from CAST" (1978-8, Council for Agricultural Science and Technology, Ames, Iowa, 1978).

OSHA Carcinogen Regulations

Philip H. Abelson, in his editorial "Regulating exposure to carcinogens" (13 Oct. 1978, p. 139), argues that regulations recently proposed by the Occupational Safety and Health Administration (OSHA) "invite ridicule, contempt, and noncompliance" by including laboratory workers along with production workers within their scope. "Professional scientists who have only occasional exposure to chemicals," he maintains, "must comply with rules designed for untrained workers exposed chronically."

Ignoring, for the moment, the content of the regulations to which Abelson objects, we question the validity of the position he represents. Our cumulative experience in both academic and private laboratories has demonstrated the ubiquity of chemical hazards in such environments. In one workplace of recent experience we were expected to work continuously over open containers of benzene, tetrahydrofuran, carbon tetrachloride, and other dangerous and volatile solvents. This laboratory, like most in the institution, did not have a ventilation hood that met federal requirements. Another situation involved having to work alongside a fellow employee handling explosive ethers while he smoked cigarettes. In this case management considered the employee's skills too valuable to risk taking measures to prevent his behavior. A final example is that of the increasing use of ethidium bromide in DNA research despite evidence that it is a potent animal carcinogen. We wonder who the "100,000" workers are, "whose most serious laboratory exposure is to ethyl alcohol."

Statistical studies support our view that scientific laboratories are legitimate targets for OSHA regulations. Some evidence was presented by *Science* itself in a News and Comment article of 3 November 1978. As these results, indicating elevated cancer incidence among chemists, probably can be generalized only to "principal investigators," one wonders what the incidence is among benchworkers.

This question brings up what we consider to be another fault in Abelson's argument. He seems to regard the laboratory as a temporary habitat where the highly trained principal investigator occasionally travels to test his theories. In reality, however, a research laboratory today is a production line at which teams of workers, including high school dropouts and Ph.D.'s, work under considerable pressure and supervision to "produce results" for research directors who spend a small fraction, at best, of their own time in the laboratory.

What is more, these research workers are rarely organized into unions. Frequently students in transit, sometimes Ph.D.'s who believe professionalism is incompatible with collective bargaining, they are without a means of self-protection.

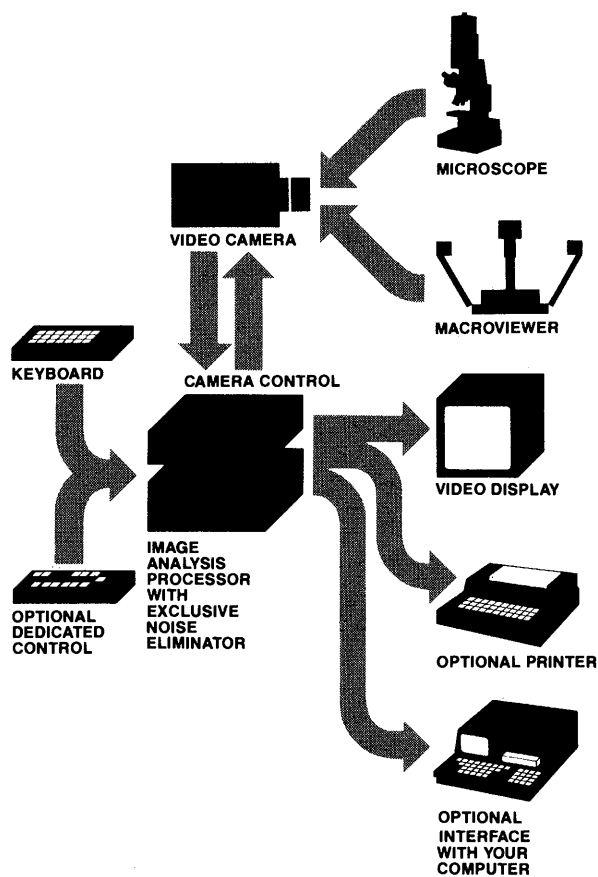
We also disagree with Abelson's characterization of the specifics of the proposed OSHA rules. Quarterly monitoring of a workplace is minimal procedure when one is dealing with potential carcinogens; some facilities should be monitored hourly. Protective clothing is also a token precaution, as it does nothing to alter the unsafe environment and frequently imposes discomfort upon the worker. Since we are now all aware that some carcinogens act over a time frame of 30 years, it should not be difficult to understand the need to maintain records for 40 years.

There is no doubt that OSHA, understaffed and underfunded, is capable of producing some unacceptably crude guidelines. These are frequently promulgated as tentative, giving affected parties ample opportunity to lobby the agency. In fact, the "tentative" nature of the regulations may be viewed as a loophole designed for manufacturers' and other institutions' objections. In any case, Abelson's insinuation that, because the Secretary of Labor must approve all changes, these regulations are not in fact tentative is unfounded. Procedurally, all departmental authority is vested in the Secretary. Thus, while the *Federal Register* may refer to him as the final authority, most responsibility is delegated to his staff or agencies within the Department of Labor. This particular aspect

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of regulatory "gobbledygook" is well known.

In conclusion, we object to Abelson's blatant endorsement of a position that is not in the best interest of the vast majority of the members of the AAAS, not to mention the entire practicing scientific community.

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DEBORAH LINDSAY

University of California, Santa Cruz

VINCENT P. MILLER

*Columbia University School of
Public Health*

Abelson's editorial concerning the OSHA Generic Carcinogen Standard reflects time-honored views held in many laboratories regarding safety and health. These views are not unlike those held by many industries in their resistance to changing their safety and health policies.

Abelson implies that professional scientists are somehow set apart from workers in a factory in their exposure to hazardous materials. There are few workplaces in this country that are as potentially hazardous as research establishments. Professional scientists are not routinely warned about the toxicity of materials they are working with, and they face the same problems as the untrained worker when handling many new chemicals. Hazard ratings, reporting procedures, information disbursement, and exposure control—all provided for by OSHA—are needed in laboratories. I am pleased to see that OSHA has finally made an impact on the research community.

CONRAD D. VOLZ

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Abelson's editorial of 13 October struck a responsive chord in me because I am concerned with complying at this institute with OSHA's present carcinogenic regulations (OSHA 2204); with the National Institutes of Health (NIH) "Laboratory safety monograph, a supplement to the NIH guidelines for recombinant DNA research"; with the Nuclear Regulatory Commission's ALARA directives; with a preliminary draft of the NIH proposals concerning a general biohazards control; with OSHA's proposed regulations for category I carcinogens; and with the full OSHA regulations relevant to laboratory safety. All of these directives have benevolent intentions,

but many of them seem to have been drawn up with no regard to efficacy or cost-benefit analysis.

For example, a wide range of commonly used organic solvents (benzene, chloroform), liquid scintillation chemicals (toluene, dioxane), and nickel and cadmium salts are designated as carcinogens. Rules now promulgated for industrial exposure may be extended to personnel in research and analytical laboratories. One such requirement is that the employer must ensure that the worker remove all clothing exposed to carcinogens at the end of the working day; the employer must also have the clothing cleaned. As there is no lower limit on exposure to carcinogens defined for this regulation, I presume that the pickup and laundry workers will, in turn, be warned of their potential exposure and will wear appropriate clothing, again to be washed, and so on.

A far more costly proposal is the requirement for medical surveillance of all workers potentially exposed to carcinogens, recombinant DNA, and bacterial or viral agents. Such surveillance has its place; it would be appropriate for every worker exposed to infectious agents to have a serum sample collected upon first being employed and to be subsequently checked after known exposure or after overt symptoms of disease appeared. However, are regular medical checks, unless very frequent, likely to coincide with the first appearance of infection or cancer? A more cost-effective program would be to require the employer to cover the cost of medical examination that the worker incurs in the belief that the symptoms relate to biohazard exposure.

From our present knowledge of radiation carcinogenesis, the only certain result we can foresee from regular surveillance would be an increased risk from that procedure itself. Without careful assessment of risks let us not mandate another expensive and dangerous program, particularly not for research laboratory workers where the hazard may come from varied agents and brief and irregular exposure.

Abelson correctly points out the practical shortcomings of these proposed regulations governing laboratory safety but does not emphasize sufficiently, in my opinion, the unnecessary cost that will be engendered if such regulations are enforced—at a time when the Office of Management and Budget is muttering threateningly about the continuing rise in overhead costs of doing research.

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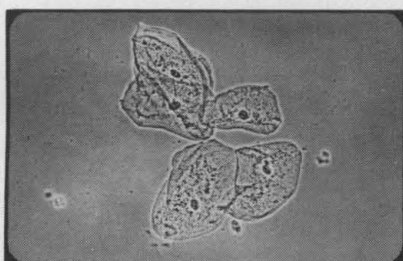


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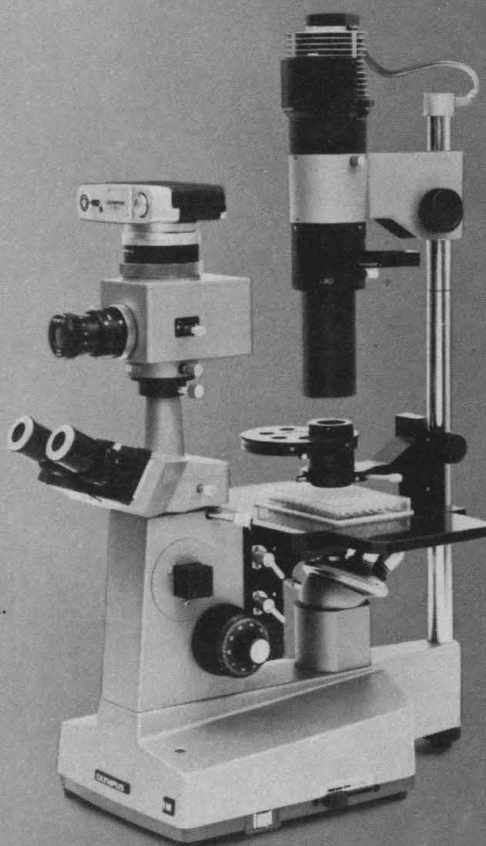
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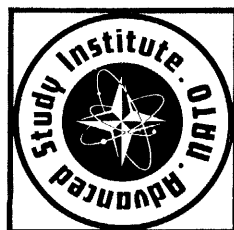


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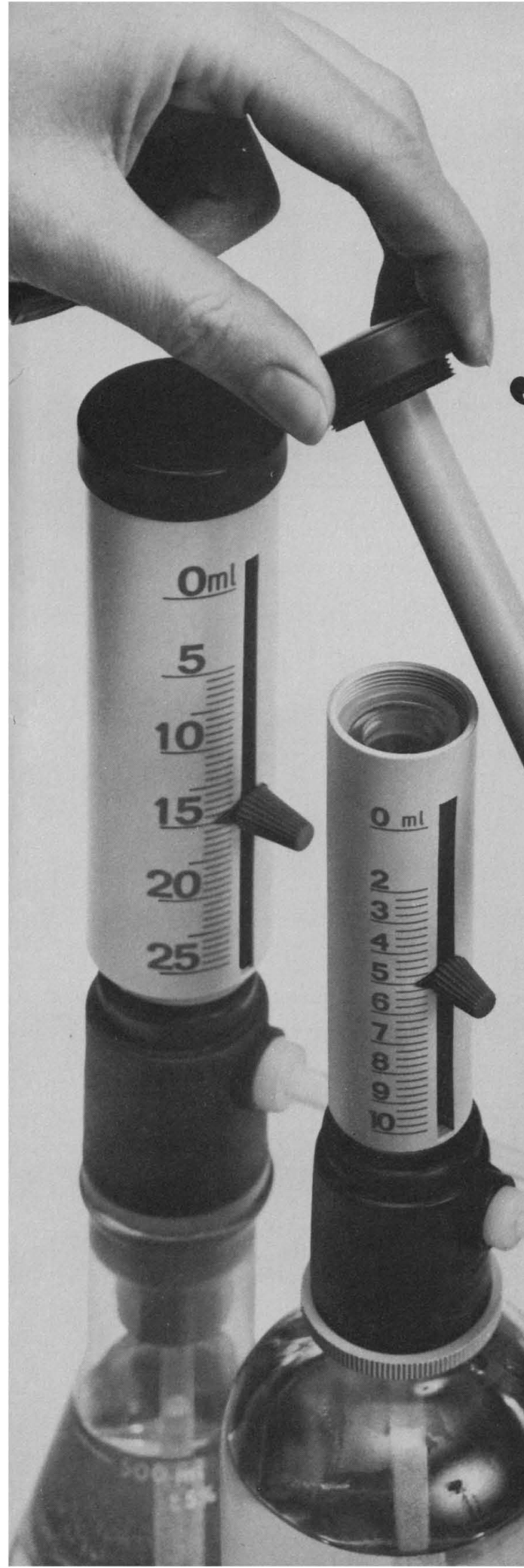
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Power in Washington

From time to time scientists inquire about why their needs and their opinions seem to receive little attention in Washington. There are many reasons. One is the climate of the times. Another is that scientists compete with increasing demands of others who have converged on the capital, all seeking to achieve or obtain something.

The past decade has seen a tremendous concentration of power in Washington and a large increase in the number of those in a position to use it. In Washington, power usually accompanies control over money, and the pots of gold are many. First, there is the \$500-billion federal budget. A piece of that is worth fighting for. Less visible, but perhaps more important, are regulatory decisions that can determine the prosperity or destruction of major industries. For example, radio and television stations are licensed by the federal government, and renewals come up every 3 years. Another set of decisions has to do with foreign dumping of products. Power over industry is illustrated by the fact that the making of steel entails compliance with 5700 regulations. Virtually all of them have some effect on the ability of the industry to compete, to survive, and to be profitable.

In dealing with agencies of the federal government, lawyers are usually the chosen instrument. Some 700 lawyers make a comfortable living for their efforts involving the Federal Communications Commission. I have made inquiries about the total number of lawyers participating in government matters; no one seems to know. The membership of the Washington Bar Association is about 25,000; a major part of this group deals with the government. In addition, a large number of lawyers appear from around the country, and some of the local lawyers who work on government matters are not members of the Washington bar.

The power center that is Washington has attracted an ever-increasing number of organizations seeking to influence what goes on here. A partial enumeration of these organizations is to be seen in the Yellow Pages of the telephone book. Some 1900 organizations are listed under the heading "Associations." Some are local or small or not particularly concerned with government. But others are large and active. Examples include the Air Line Pilots Association, the National Coal Association, and the National Education Association. In addition, many organizations, such as public interest groups, labor unions, trade organizations, and corporations, engage in efforts to influence the government.

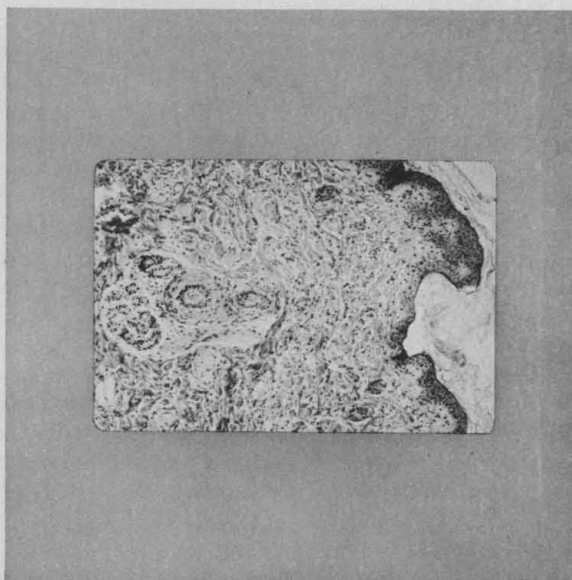
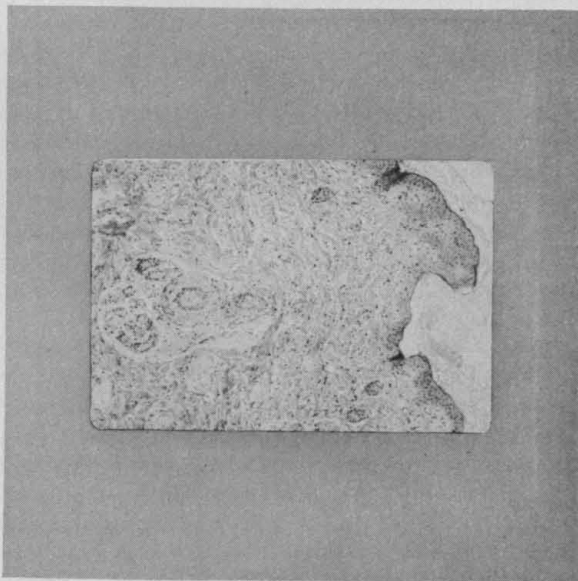
Whom do the tens of thousands of would-be influencers work on? Many, of course, would like to have the ear of the President or, failing that, of the Vice President, the White House staff, or a Cabinet officer. On the executive side of the government, most have to be content with civil servants, who by their sheer numbers and by their duties have enormous total power. On Capitol Hill there are many targets in addition to senators and representatives. A recent count shows 20,000 people on various congressional staffs. The majority are aides to congressmen; others are on staffs of committees. For example, the Senate Judiciary Committee has a staff of about 300.

In addition to contact with the Administration and Congress, the influencers work effectively in other ways. A prime target is the media, which are vulnerable to skillfully prepared material and responsive to the right kinds of press conferences.

One approach to influencing any particular issue in Congress is to identify the relevant key members of Congress and the people in their home districts who influence them. Means are then found to intercede with the congressmen at a crucial moment just before the votes are taken. This technique involves knowing when legislation is likely to mature and the key people involved, timing, computer printouts of information, and many telephone calls. When billions of dollars are at stake, a commensurate effort is indicated. With that kind of game preoccupying Washington, scientists should feel fortunate that they obtain as much attention as they do.

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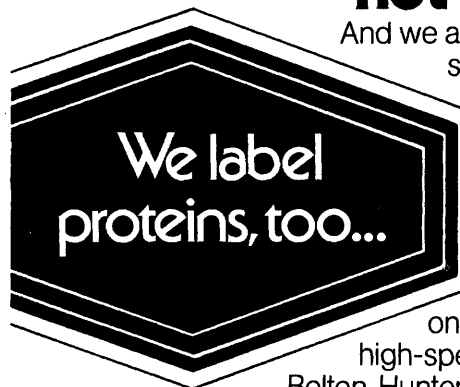
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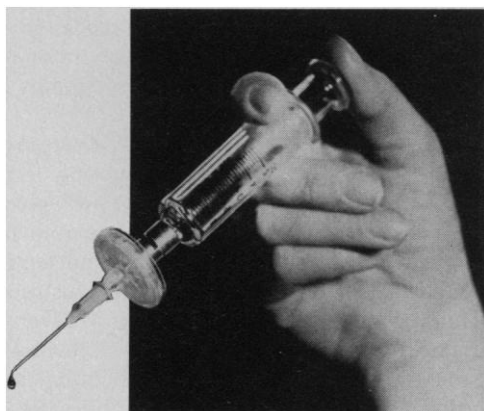
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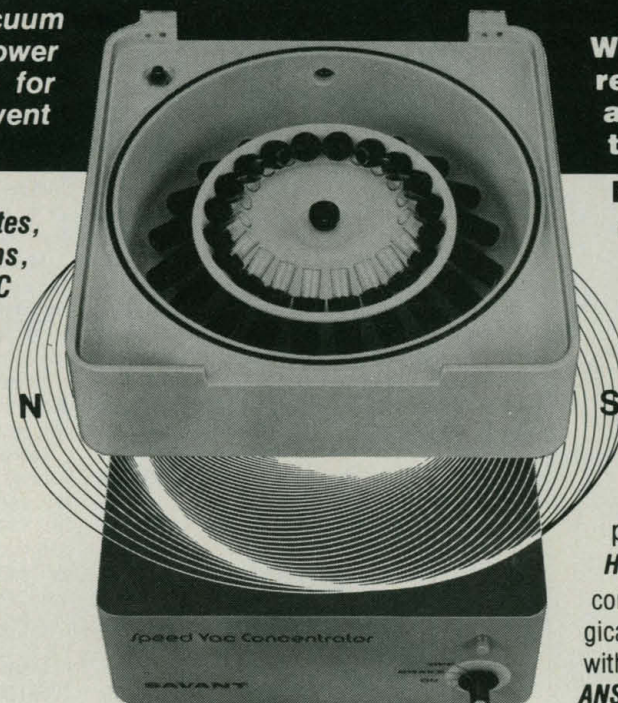
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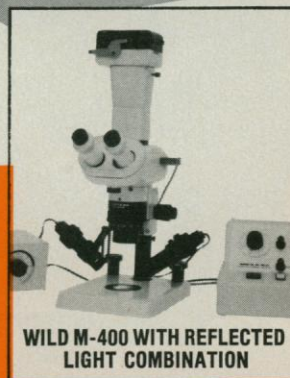
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