

17876 St. Clair Avenue

Cleveland, Ohio 44110

216-486-4200

October 6, 2006

Submitted Electronically

OSHA Docket Office

Room N-2625

U.S. Department of Labor

200 Constitution Avenue

Washington, DC 20210

Re: OSHA Docket No. ICR-1218-ONEW-01-(2006)

Dear Sir:

Brush Wellman Inc. submits these comments on OSHA's proposed Conflict of Interest and Disclosure Form pursuant to 71 Federal Register 44714 (Aug. 7, 2005).

Brush Wellman supports the efforts of OSHA to require broad disclosures by prospective peer reviewers as to their interests in the topic for review. The proposed Form is consistent with the growing recognition of the need to identify relationships which create potential conflicts of interest, particularly in medical research. See, e.g., "Health Industry Practices that Create Conflicts of Interest," Journal of the American Medical Association 295:429 (Jan. 25, 2006).

As indicated by Appendix A to the Form, its purpose is to identify interests that can reasonably affect current behavior or that can be perceived to have such an effect. In order to achieve this purpose, Brush Wellman suggests that the Form inquire as to connections between the prospective peer reviewer and the topic for a period longer than 24 months, which is the period used by the current Form. Brush Wellman believes that a period of at least five years up to ten years would better serve this purpose.

Sincerely,

Marc E. Kolanz

Vice President

Environmental Health & Safety

MEK/elm