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FACSIMILE TRANSMITTAL SHEET

TO: **REF: NIOSH Docket #248**	FROM: On behalf of the **Sergeants Benevolent Association of New York City**
COMPANY: **NIOSH Docket Office**	DATE: **January 6, 2012**
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RE:	YOUR REFERENCE NUMBER:

☐ URGENT ☐ FOR REVIEW ☐ PLEASE COMMENT ☐ PLEASE REPLY ☐ PLEASE RECYCLE

NOTES/COMMENTS:

Comments of the Sergeants Benevolent Association of New York City, regarding the World Trade Center Health Program Scientific/Technical Advisory Committee Meeting of January 24, 2012.

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SERGEANTS BENEVOLENT ASSOCIATION

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REF: NIOSH Docket #248
World Trade Center (WTC) Health Program Scientific/ Technical Advisory Committee Meeting of January 24, 2012

Dear Advisory Committee Members:

On December 29, 2011, the Centers for Disease Control, U.S. Department of Health and Human Services, published a notice in the *Federal Register* requesting comments regarding the January 24, 2012 meeting of the World Trade Center Health Program Scientific/Technical Advisory Committee. The agenda for the meeting includes a discussion related to the petition to add cancer to the list of WTC Health Program covered conditions. This petition, filed on September 7, 2011 by nine Members of Congress, requested an immediate review of new medical evidence to determine whether cancer, or specific types of cancer, should be added to the list of covered conditions for purposes of the World Trade Center Health Program. I am writing on behalf of the more than 11,000 members of the Sergeants Benevolent Association of New York City (SBA) in strong support of the petition and the addition of cancer to the list of WTC Health Program covered conditions.

As the SBA noted in its comments to the National Institute for Occupational Safety and Health (NIOSH) last year on the proposed implementation of Title I of the James Zadroga 9/11 Health and Compensation Act (NIOSH-226, 76 Fed. Reg. 12360), the determination regarding whether cancer or specific types of cancer should be included as a covered illness is of the utmost importance to our organization. On September 11, 2001, the New York City Police Department (NYPD) lost 23 officers in the collapse of the World Trade Center. In the ten years since, nearly 50 officers have died of a

9/11-related illness, including six Sergeants of the NYPD and members of the SBA whose deaths were caused by cancer: Sgt. Claire Hanrahan (August 28, 2007); Sgt. Michael Ryan (November 5, 2007); Sgt. Edward Thompson (March 20, 2008); Sgt. Alex Baez (November 21, 2008); Sgt. Charles J. Clark (November 7, 2009); and Sgt. Harold Smith (March 5, 2011). They are just a few of the numerous individuals who have died from a 9/11-related cancer. Unfortunately, they will not be the last.

In July 2011, WTC Health Program Administrator Dr. John Howard made the initial determination with respect to cancer as required by the Act. In it, he noted that "[a]lthough a determination cannot be made to propose a rule to add cancer, or a type of cancer, to the List of WTC-Related Health Conditions at this time, it is important to point out that the current absence of published scientific and medical findings… does not indicate evidence of the absence of a causal association." This initial determination, however, was made prior to last year's report in *The Lancet* on the incidence of cancer in firefighters exposed to toxins at the World Trade Center. We believe it is therefore appropriate to review the initial determination in light of this new evidence, as well as any additional evidence that may be available. Given the risk to police officers, firefighters, and other first responders who answered the call of duty on 9/11 and who are currently suffering from, or are at risk of developing, a WTC-related cancer, we believe this review must be as thorough and as expeditious as possible.

On behalf of the membership of the Sergeants Benevolent Association, thank you for your attention to our concerns on this important matter. Please do not hesitate to contact me, or our Washington Representatives Andrew Siff and Chris Granberg at (202) 457-7756, if you have any questions or would like to discuss this matter further.

Sincerely,

Ed Mullins

Ed Mullins
President