-----Original Message-----
From: Sander Greenland [mailto:lesdomes@ucla.edu]
Sent: Tuesday, October 16, 2001 4:08 PM
To: ocas@cdc.gov
Subject: Guidelines for Determining the Probability of Causation

Regarding the Notice of Proposed Rulemaking, "Guidelines for Determining the Probability of Causation" (Oct. 5, 2001): This document is based on a formula for the probability of causation that can be drastically incorrect, even in radiation carcinogenesis, as has been shown in many peer-reviewed articles since 1987, including the following (which give further references):

Robins JM, Greenland S. The probability of causation under a stochastic model for individual risk. Biometrics 1989; 45:1125-1138.
Greenland S. The relation of the probability of causation to relative risk and doubling dose. American Journal of Public Health 1999; 89:1166-1169.
Beyea J, Greenland S. The importance of specifiying the underlying biologic model in estimating the probability of causation. Health Physics 1999; 76:269-274.
Greenland S, Robins JM. Epidemiology, justice, and the probability of causation. Jurimetrics 2000; 40: 321-340.

-- Sander Greenland
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