

Date: Thu, 07 Nov 2013 08:23:34 -0800
To: "Alpa V. Patel" <alpa.patel@cancer.org>
From: "James E. Enstrom" <jenstrom@ucla.edu>
Subject: Request Regarding ACS CPS II Data Use & Access

November 7, 2013

Alpa V. Patel, Ph.D.
Epidemiology Research Program
American Cancer Society
National Home Office
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Dear Dr. Patel,

I am writing to request your response to five conclusions below regarding the use of ACS CPS II cohort data to analyze the relationship of fine particulate air pollution (PM2.5) and mortality in California. Based on the ACS Cancer Prevention Studies Data Access Policies and Procedures (<http://www.cancer.org/acs/groups/content/@research/documents/document/acspc-039148.pdf>), you are the most appropriate Epidemiology Research Program team member to respond to my specific concerns (<http://www.cancer.org/research/acresearchers/alpa-patel-phd>).

Background

I have substantial direct evidence that the relationship between PM2.5 and total mortality, particularly in California, has been improperly calculated and improperly characterized in the following six publications that are based on ACS CPS II cohort data: 1995 Pope *AJRCCM* paper (<http://www.atsjournals.org/doi/abs/10.1164/ajrccm.151.3.7881654>), 2000 Krewski HEI Reanalysis Report (<http://pubs.healtheffects.org/view.php?id=6>), 2002 Pope *JAMA* paper (<http://jama.jamanetwork.com/article.aspx?articleid=194704>), 2009 Krewski HEI Research Report 140 (<http://pubs.healtheffects.org/view.php?id=315>), October 28, 2011 Jerrett Report (<http://www.scientificintegrityinstitute.org/JerrettCriticism102811.pdf>), and September 1, 2013 Jerrett *AJRCCM* paper (<http://www.atsjournals.org/doi/abs/10.1164/rccm.201303-0609OC>).

This CPS II data has been the major part of an August 1, 2013 US House Science Committee subpoena of EPA (<http://science.house.gov/press-release/smith-subpoenas-epa-s-secret-science>). EPA currently stands in default of the subpoena in major part because the requested CPS II data has not been delivered (<http://science.house.gov/press-release/smith-epa-stands-default-subpoena>). Consequently, EPA Administrator Gina McCarthy is scheduled to be questioned at a November 14, 2013 US House Science Committee hearing about EPA compliance with the subpoena.

Request

Because of my long involvement with epidemiologic research, ACS epidemiologists, CPS I and CPS II data, and ACS procedures regarding the use of these data, I have come to the following five conclusions:

- 1) The September 1, 2013 Jerrett *AJRCCM* paper seriously misrepresents the relationship between PM2.5 and total mortality in California, based on comparison with the overwhelmingly null findings in the October 28, 2011 Jerrett Report and numerous other null findings.
- 2) ACS must make public all computer programs, outputs, and tabulations based on CPS II data that were used in the preparation of the 2000 Krewski HEI Reanalysis Report and the 2009 Krewski HEI Research Report, particularly as they relate to Figures 5 and 21 in the 2000 Report.
- 3) ACS must fully comply with the US House Science Committee subpoena of EPA by providing to EPA the requested de-identified CPS II data, particularly since the prior release of similar de-identified CPS II data to investigators outside of ACS over the past 20+ years has never compromised CSP II subject confidentiality.
- 4) ACS violated its 1982 agreement with CPS II subjects to keep their personal questionnaire data confidential (“We will **never** release information about any particular person and will not release addresses to any agency for any purpose, whatsoever.”) when it provided home address data on CPS II subjects to the 2011 Jerrett Report investigators beginning in 2007 or 2008.
- 5) ACS enrollment of subjects in CPS 3 must be suspended until the above four conclusions, particularly conclusion 4), have been properly addressed and satisfactorily resolved by ACS.

Please let me know if you agree with any or all of my five conclusions and if you will cooperate with me or anyone else outside of ACS in resolving the above five conclusions. If you are more comfortable responding to someone other than me, I strongly recommend that you contact the chair of your Ph.D. dissertation committee, who is quite familiar with me, PM2.5 epidemiology, and most of my conclusions.

Until I receive direct confirmation that you agree with some or all of my conclusions, I will assume that you agree with none of them and that you will not cooperate in addressing and resolving them.

Thank you very much for your prompt consideration of this very important request.

Sincerely yours,

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