



**LAURENCE B. McCULLOUGH, Ph.D.**  
Dalton Tomlin Chair in Medical Ethics and Health Policy  
Professor of Medicine and Medical Ethics  
Associate Director for Education  
Center for Medical Ethics and Health Policy

ONE BAYLOR PLAZA  
HOUSTON, TEXAS 77030-3411  
713-798-3505  
713-798-5678 FAX  
mccullou@bcm.edu

April 23, 2010

Kristina C. Borrer, Ph.D.  
Director, Division of Compliance Oversight  
Office of Human Research Protections  
U.S. Department of Health and Human Services  
The Tower Building  
1101 Wooton Parkway, Suite 200  
Rockville, MD 20852

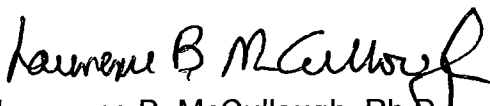
Dear Dr. Borrer:

On February 3, 2010, you were sent a "Letter of Concern from Bioethicists" about the prenatal administration of dexamethasone to prevent virilization of CAH-affected females. This Letter raised a number of ethical concerns.

On behalf of my co-authors and with the permission of Glenn McGee, Ph.D., Editor of the American Journal of Bioethics to which we have submitted a paper about the Letter of Concern, I am sending you a copy of our paper that we wrote in response to what we believe is an example of unethical transgressive bioethics.

We hope that your will take our critique into account in your deliberations.

Sincerely,

  
Laurence B. McCullough, Ph.D.  
Dalton Tomlin Chair in Medical Ethics and Health Policy

cc: Frank A. Chervenak, M.D.  
Robert L. Brent, M.D., Ph.D.  
Benjamin Hippen, M.D.

A Case Study in Unethical Transgressive Bioethics:  
fetaldex.org's Letter of Concern about the Prenatal Administration of  
Dexamethasone

Laurence B. McCULLOUGH, Ph.D.  
Center for Medical Ethics and Health Policy  
Baylor College of Medicine  
Houston, Texas

Frank A. CHERVENAK, M.D.  
Department of Obstetrics and Gynecology  
Weill Medical College of Cornell University  
New York, New York

Robert L. BRENT, M.D., Ph.D., DSc (Hon)  
Thomas Jefferson University  
Alfred I duPont Hospital for Children  
Wilmington, Delaware

Benjamin HIPPEN, M.D.  
Metrolina Nephrology Associates, P.A., and the Carolinas Medical Center  
Charlotte, North Carolina

Correspondence:

Laurence B. McCullough, Ph.D.  
Dalton Tomlin Chair in Medical Ethics and Health Policy  
Center for Medical Ethics and Health Policy  
Baylor College of Medicine  
One Baylor Plaza  
Houston, TX 77030-3411  
713.798.3505  
713.798.5678 (fax)  
mccullou@bcm.edu

Word Counts

Abstract:	150
Text only:	5701
Acknowledgement:	24
References:	845
Appendix:	1347