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The Honorable Elaine L. Chao
Secretary of Transportation
United States Department of Transportation
1200 New Jersey Avenue, S.E.
Washington, DC 20590

ATTN: Blane A. Workie, Assistant General Counsel for Aviation
Enforcement Proceedings

RE: Docket No. DOT-OST-2018-0124
NABR v. United Airlines et al

Dear Madam Secretary:

The American Society for Pharmacology and Experimental Therapeutics (ASPET) presents its comment to the Department of Transportation (DOT) in support of the above-referenced complaint submitted by the National Association for Biomedical Research (NABR). This complaint alleges that certain airlines are refusing to transport animals needed for critical biomedical research.

ASPET is a 5,000 member scientific society located in Rockville, MD whose members conduct essential basic and clinical pharmacological research and work for academia, government, large pharmaceutical companies, small biotech companies, and non-profit organizations. ASPET members work in a variety of different fields and their efforts help to develop new medicines and therapeutic agents to fight existing and emerging diseases. Our members take seriously the responsibility of working with research animals and are committed to abiding by existing animal welfare regulations.

Research into the effects of drugs requires the use of models that mimic living systems. Some tests can be done using computer models or cell cultures, but these research methods can currently only be used for simple experiments – these models lack the complexity of an animal or human. For more complex experiments, scientists need to use animal models. In fact, many federal agencies (e.g., the National Institutes of Health and the Food and Drug Administration) *require* the use of research animals to evaluate the efficacy and effectiveness of drugs prior to testing in human subjects. Without access to research animals, pharmacologists and other federally-funded scientists are unable to perform their jobs.

The above-mentioned complaint alleges that some airlines are refusing to transport animals needed for vital biomedical research, which is a violation of 49 U.S.C. §§ 41310(a),

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44902(b), 41501, and 41704. There are no valid safety-related reasons to justify a refusal to transport research animals. Indeed, these same airlines will transport animals of the same species when shipped as pets or zoo animals.

We strongly share the concerns raised in this complaint: It is arbitrary and therefore illegal for airlines to refuse to transport research animals. We urge the DOT to investigate this complaint and to require airlines to eliminate policies that discriminate against the transportation of animals needed for legal, legitimate, biomedical research that is essential to developing life-saving treatments for devastating diseases.

Sincerely,

A handwritten signature in black ink that reads "Edward Morgan". The signature is written in a cursive, flowing style.

Edward T. Morgan, PhD
President, ASPET