



# FASEB

Federation of American Societies  
for Experimental Biology

## Representing Over 130,000 Researchers

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October 3, 2018

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 Federation of American Societies for Experimental Biology (FASEB) is pleased to provide the Department of Transportation (DOT) with information relevant to the evaluation of the above-referenced complaint alleging refusal by certain airlines to transport animals needed for critical biomedical research.

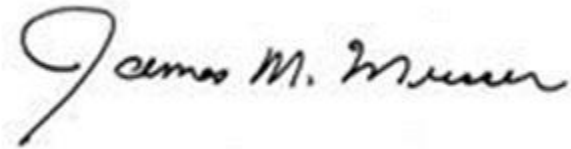
Research institutions and scientists around the world are dependent upon the domestic and international shipment of laboratory animals to develop treatments for disease and to understand the fundamental processes of life. Nearly every major medical advance in recent history has involved animal research, and it remains a critical component in preventing, treating, and curing devastating diseases such as cancer, diabetes, HIV/AIDS, and infectious, communicable diseases, Alzheimer's and other neurological disorders, and heart disease among many that effect global human health and well-being.

Scientists require the most appropriate animal model for studying a particular disease or condition. Shipment of these animals by air carrier allows for them to be available where and when they are required and is the most humane method of transport over long distances. Numerous regulations and guidelines are in place to ensure the safety and wellbeing of the animals during shipment. Therefore, FASEB is concerned about the above-mentioned complaint's allegation of the refusal by some airlines to transport animals for needed for research purposes.

We urge DOT to investigate this complaint, specifically the alleged violations of 49 U.S.C. §§ 41310(a), 44902(b), 41501, and 41704. The decision of certain airlines to refuse transport of live animals for research purposes delays progress of critical research efforts, and there are no valid safety-related justifications for such refusal.

FASEB shares the concerns raised in this complaint, and urges thorough investigation by DOT to ensure airline policies do not arbitrarily exclude transport of animals necessary for critical, life-saving biomedical research.

Sincerely,

A handwritten signature in black ink that reads "James M. Musser". The signature is written in a cursive style with a large initial 'J'.

James M. Musser, MD, PhD  
FASEB President