

## 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.

The American Physiological Society • American Society for Biochemistry and Molecular Biology • American Society for Pharmacology and Experimental Therapeutics American Society for Investigative Pathology • American Society for Nutrition • The American Association of Immunologists • American Association of Anatomists The Protein Society • Society for Developmental Biology • American Peptide Society • Association of Biomolecular Resource Facilities The American Society for Bone and Mineral Research • American Society for Clinical Investigation • Society for the Study of Reproduction • The Teratology Society The Endocrine Society • The American Society of Human Genetics • International Society for Computational Biology • American College of Sports Medicine Biomedical Engineering Society • Genetics Society of America • The Histochemical Society • Society For Experimental Biology and Medicine Association for Molecular Pathology • Society for Redox Biology and Medicine • Society For Experimental Biology and Medicine American Aging Association • U.S. Human Proteome Organization • Society of Toxicology 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,

James M. mun

James M. Musser, MD, PhD FASEB President