



September 20, 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: Submission in *NABR v. United Airlines et al.* Docket No. DOT-OST-2018-0124

Dear Madam Secretary:

We are submitting this letter to provide the Department of Transportation (DOT) with information that may be relevant to its evaluation of the above referenced complaint, which alleges that various airlines refuse to carry animals for critical biomedical research, but carry them for other purposes.

The Council on Governmental Relations is an association of 187 leading research universities, affiliated medical centers, and independent research institutes. Member institutions play a major role in performing research on behalf of the federal government. Key to the performance of life-saving biomedical research is the use of laboratory animals and engagement of human participants. Research into the etiology of diseases and disorders and the development of drugs, devices, and other mechanisms to treat and cure them is otherwise not possible.

It is troubling that, as indicated in the complaint, many airlines refuse to transport animals for these vital scientific discoveries, while transporting the same animals for non-research purposes. Much of the research conducted at our member institutions is funded by the U.S. government through the National Institutes of Health and other federal agencies. It is therefore essential that the federal government enforce its laws consistent with its investment in research and disallow this arbitrary delineation by the airlines which we understand involves no transportation-related concerns.

We urge the DOT to investigate this complaint and to require all airlines to eliminate policies which discriminate against carriage of laboratory animals used for legal, legitimate, and life-saving biomedical research. Consistent policies and practices with respect to animal carriage are critically needed. We ask that DOT take action to ensure the continued progress of essential research.

We appreciate the opportunity to comment on this matter. Please contact me or Lisa Nichols, Director, Research and Regulatory Reform, (lnichols@cogr.edu) if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Anthony P. DeCrappeo". The signature is fluid and cursive, written over a white background.

Anthony P. DeCrappeo
President