June 25, 2021

Dr. Robert C. Hampshire, PhD
Chief Science Officer
United States Department of Transportation
1200 New Jersey Avenue, S.E. Washington, DC 20590

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

Dear Dr. Hampshire,

On behalf of the 90 undersigned organizations representing a wide range of biomedical professional societies, institutions, and individual researchers, we commend the Department of Transportation's (DOT) decision to appoint a Chief Science Officer. Science plays an integral role in operating, maintaining, and enabling a robust infrastructure system that enhances the American economy and our quality of life. Accordingly, we strongly encourage the Chief Science Officer to review the 2018 docket complaint (Docket No. DOT-OST-2018-0124, NABR v. United Airlines et al) regarding the refusal of certain airlines to transport animals for research purposes. This unresolved complaint continues to jeopardize essential biomedical research by inhibiting access to the appropriate animal models necessary for addressing the nation's pressing scientific and public health questions. As part of the Administration's efforts to elevate science in the policy-making process, we encourage DOT to review this complaint and ensure that airline policies do not arbitrarily exclude transport of animals required for life-saving biomedical research, including drug testing required by law.

Animal models are legally and scientifically necessary for biomedical research advancements and understanding fundamental processes of life. Nearly every major medical advancement has involved animal research, including most recently, virulence factor characterization of SARS-CoV-2 and the subsequent development of COVID-19 vaccines. Because animal research remains a global collaborative effort and a critical component in preventing, treating, and curing devastating diseases, continued progress depends upon domestic and international air transportation of laboratory animals. The ongoing refusal by airline companies to carry animals for research purposes violates several provisions of federal law, including those that prohibit unreasonable discrimination (49 U.S.C. §§ 41310(a)), whereby airline carriers remain willing to transport animals for non-research purposes such as personal pets, zoos, and conservation efforts, yet discriminate against transportation of animals for research endeavors.

With the majority of airlines refusing transport of research animals, the biomedical research community must utilize other means of transportation, including charter flights and ground transportation. These methods are significantly more costly and time-consuming, leaving researchers unable to keep up with the demand for vital animal models. Scheduled air transportation is both cost-effective and can be in the best interest of animal welfare given its often shorter duration with rigorous oversight. All airline carriers must abide by the International Air Transportation Association's (IATA) guidance, which remains the worldwide standard for ensuring safe animal transport. Accordingly, the IATA Manual indicates that animal transportation is safe when detailed container, feeding, and water protocols are followed (Ch. 8, 210-408). Furthermore, scheduled flights are frequently designed to take the shortest time possible,

resulting in less overall stress on animals. Several studies have shown that biological stress alters animal hormone levels and weakens their immune responses[1,2,3], potentially leading to confounding results in research studies. Considering that good science and animal welfare are complementary objectives, transportation methods that minimize stress and enhance animals' ability to sustain travel are essential for preserving animal health and strengthening critical research necessary for scientific growth.

Airline restrictions continue to endanger the nation's global competitiveness as world leaders in scientific discovery and limit researchers' access to appropriate animal models. Laboratory animal models are not only essential for facilitating our nation's response to the ongoing COVID-19 pandemic, but also play an integral role in understanding various other diseases afflicting numerous Americans, including Alzheimer's disease, cancer, and diabetes. As other nations accelerate investments in research and development, we are concerned that leaving this issue unresolved will unnecessarily delay U.S. research productivity and weaken our nation's ability to respond to future public health crises.

To strengthen U.S. research leadership, we encourage DOT to enforce laws that enhance rather than undermine scientific innovation. Therefore, we respectfully urge the Chief Science Officer to review the 2018 National Association for Biomedical Research complaint to secure the U.S.'s position as a global scientific leader and ensure sustained biomedical progress that will advance human and animal health.

Sincerely,

American Academy of Neurology
American Association for Accreditation of Laboratory Animal Care (AAALAC International)
American Association of Immunologists
American Association for Laboratory Animal Science (AALAS)
American Association of Veterinary Medical Colleges
American Brain Coalition
American College of Neuropsychopharmacology
American Psychological Association (APA)
American Physiological Society
American Society for Bone and Mineral Research
American Society of Laboratory Animal Practitioners
American Society for Microbiology
American Society for Nutrition
American Society for Pharmacology and Experimental Therapeutics
American Society of Primatologists
American Surgical Association
American Veterinary Medical Association
Americans for Medical Progress
Amgen
Association of American Medical Colleges
Association of American Universities
Association of Primate Veterinarians (APV)
Association for Research in Vision and Ophthalmology

Baylor College of Medicine
California Biomedical Research Association
California National Primate Research Center
Calvert Labs
Case Western Reserve University
Charles River Laboratories
Comparative Biosciences, Inc.
Covance Laboratories Inc.
Craig H. Neilsen Foundation
Duke University
Endocrine Society
Envigo
European Animal Research Association
Experimur
Federation of American Societies for Experimental Biology
Genetics Society of America
Harvard Medical School
Harvard University
Hilltop Lab Animals, Inc.
Indiana University
Institutional Animal Care and Use Committee
Louisiana State University
Marshall BioResources
Mass General Brigham
Memorial Sloan Kettering Cancer Center
National Association for Biomedical Research
New Jersey Association for Biomedical Research
New York University's Langone Health/NYU Grossman School of Medicine
Northwest Association for Biomedical Research
Novartis Pharmaceuticals Corporation
Oregon Health & Science University
Oregon National Primate Research Center
Pennsylvania Society for Biomedical Research
Pfizer
Sanofi
Sinclair Research Center
Society for Neuroscience
Society for Redox Biology and Medicine
Society of Toxicology
Southwest National Primate Research Center
Supporting Truth about Animal Research (STAR): A Coalition of Scientific Societies
Taconic Biosciences
Texas Society for Biomedical Research
The Histochemical Society

The Jackson Laboratory
The Mannheimer Foundation, Inc.
The Massachusetts Society for Medical Research
The University of Louisville
Tulane National Primate Research Center
University of Arizona
University of California, Davis
University of California System
University of Georgia
University of Hawaii
University of Massachusetts Medical School
University of New Mexico
University of Pittsburgh
University of Texas Health Science Center San Antonio
University of Washington
Validated Delivery Solutions, LLC
Wake Forest University
Washington National Primate Research Center
Washington University in St. Louis
Weill Cornell Medical College
Wisconsin National Primate Research Center
Yale University
Yerkes National Primate Research Center

cc: Secretary Pete Buttigieg

1. Landi MS, Kreider JW, Lang CM, Bullock LP. Effects of shipping on the immune function in mice. Am J Vet Res. 1982 Sep;43(9):1654-7. PMID: 7149414.
2. Aguila HN, Pakes SP, Lai WC, Lu YS. The effect of transportation stress on splenic natural killer cell activity in C57BL/6J mice. Lab Anim Sci. 1988 Apr;38(2):148-51. PMID: 3374089.
3. Van Ruiven R, Meijer GW, Wiersma A, Baumans V, van Zutphen LF, Ritskes-Hoitinga J. The influence of transportation stress on selected nutritional parameters to establish the necessary minimum period for adaptation in rat feeding studies. Lab Anim. 1998 Oct;32(4):446-56. doi: 10.1258/002367798780599893. PMID: 9807759.