

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<sup>1,2,3</sup>, 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  
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.