



**Association of  
American Medical Colleges**  
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September 21, 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 respectfully submit this letter to provide the U.S. 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 Association of American Medical Colleges (AAMC) is a not-for-profit association representing all 151 accredited U.S. and 17 accredited Canadian medical schools; nearly 400 major teaching hospitals and health systems, including 51 Department of Veterans Affairs medical centers; and more than 80 academic societies. Through these institutions and organizations, the AAMC serves the leaders of America's medical schools and teaching hospitals and their more than 173,000 full-time faculty members, 89,000 medical students, 129,000 resident physicians, and more than 60,000 graduate students and postdoctoral researchers in the biomedical sciences.

The AAMC has long supported the responsible and humane care of animals used in research, as our member institutions continue to make innovations in the treatment of cancer, heart disease, infectious diseases, and many other afflictions. Our member institutions, including Veterans hospitals, are also furthering remarkable research in treating physical disability and injury, including development of next generation prosthetics and neural interfaces. Researchers must rely on animal research to safely develop treatments for both people and animals alike. Moreover, federal laws and regulations mandate this kind of research before life-saving medicines and treatments may be approved for use in humans.

We are concerned that, as outlined in the complaint, many airlines refuse to transport animals for these vital scientific discoveries, although the airlines will transport the same animals for non-research purposes, such as for zoos or as pets. We believe that as the government responsibly requires this research, it should also enforce its laws in a way that does not undermine these essential research requirements. This arbitrary and capricious delineation by the airlines - which

has no transportation related purpose - threatens the progress of key research, research which could reduce or even eradicate diseases.

We urge the DOT to investigate the complaint filed by National Association for Biomedical Research (NABR) and to require all airlines to eliminate policies which prohibit animal carriage even for legal, legitimate, necessary and essential life-saving biomedical research. We respectfully request that DOT take these actions to ensure the continued progress of essential medical research.

The AAMC appreciates the opportunity to comment to the DOT on this matter and would be pleased to provide any further information moving forward. Please contact me or my colleague, Stephen Heinig, Director of Science Policy, ([sheinig@aamc.org](mailto:sheinig@aamc.org)) with questions about these comments.

Sincerely,

A handwritten signature in cursive script that reads "Karen D. Fisher".

Karen Fisher, JD  
AAMC Chief Public Policy Officer