



October 8, 2018

The American Society for Investigative Pathology (ASIP), a nonprofit educational 501(c)(3) organization primarily representing the academic pathology research community, offers the following comments related to transport of research animals (Docket No. DOT-OST-2018-0124). We are a society of biomedical scientists who investigate disease, linking the presentation of disease in the whole organism to its fundamental cellular and molecular mechanisms. Our members use a variety of structural, functional, and genetic techniques, seeking to ultimately apply research findings to the diagnosis and treatment of patients. Our society represents approximately 1,000 physicians and doctoral scientists who perform or are involved with pathology research in academic medicine, government, and private industry.

ASIP believes that the use of animals in research activities is critical to discoveries that improve the quality of life for both humans and animals. The government should enforce its laws in a way that does not undermine essential research requirements. This arbitrary decision by the airlines to transport the same animals for non-research purposes, such as for zoos or as pets, but not for research threatens the progress of key research activities. We urge the Department of Transportation to investigate this complaint and eliminate policies that discriminate against the transportation of animals needed for legal, legitimate biomedical research essential to developing clinical treatments.