



October 3, 2018

The Honorable Elaine Chao
Secretary of Transportation
United States Department of Transportation
1200 New Jersey Avenue, S.E.
Washington, D.C. 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:

On behalf of the Association for American Universities (AAU), an association of 60 leading public and private research universities in the United States, I wish to provide information relevant to the Department of Transportation's (DOT) evaluation of *NABR v. United Airlines et al.* Docket No. DOT-OST-2018-0124 complaint, which alleges that various airlines refuse to transport animals for critical biomedical research but carry transport for other purposes.

Researchers at AAU's member universities use animal models to advance medical discoveries and improve the health of Americans. For example, advances in cancer immunotherapy, vaccine research, and opioid dependence are made possible through research involving animals. Researchers rely on live-animal research to safely develop treatments for both people and animals alike. Access to live-animal subjects is required in order to conduct this revelatory work. At the same time, current laws and regulations mandate this kind of research before life-saving medicines and treatments may be approved for use in humans.

According to 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. This arbitrary delineation by the airlines - which we understand has no transportation related purpose - threatens the progress of key research, research which could reduce or even eradicate diseases. We believe that as long as the federal government requires this research, it should also enforce its laws in a way that does not undermine these essential research requirements.

AAU urges the DOT to investigate the complaint filed by NABR and to require all airlines to eliminate policies that discriminate against research animal carriage. The carriage of research animals should be based solely on the fact that the purpose of the transportation of these animals is 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.

Sincerely,

A handwritten signature in black ink that reads "Mary Sue Coleman". The signature is written in a cursive, flowing style.

Mary Sue Coleman
President
Association of American Universities