



December 1, 2006

Manager
Mailing Standards
U.S. Postal Service
475 L'Enfant Plaza, SW - Room 3436
Washington, DC 20260-3436

Dear Manager:

The nation's public health laboratory directors welcome the opportunity to comment on the interim final rule for 39 CFR Part 111, the "New Mailing Standards for Division 6.2 Infectious Substances". The directors are the principal members of the Association of Public Health Laboratories (APHL), an association that advocates a strong public health system that integrates public health laboratories as a vital resource for protection against diseases and other health threats. APHL connects the public health laboratories in all 50 states and six territories, and enjoys its well-established relationship with the U.S. Postal Service through its role as the confirmatory laboratory for the operations of the BDS.

APHL supports the harmonization of mailing standards with the World Health Organization *Guidance on Regulations for the Transport of Infectious Substances* and the International Civil Aviation Organization (ICAO) *Technical Instructions for the Safe Transport of Dangerous Goods by Air*. However, APHL has significant concerns regarding the prohibition of Category A infectious substances in the mail, and especially its impact on geographically large and sparsely populated states. Important specimens may never be sent because there is no practical cost-efficient way to get them to where they need to go. Without public health laboratory testing diseases may not be properly diagnosed and treated, and infection will spread putting the population at greater risk of disease.

The revised standards prohibiting Category A infectious substances for transport in the mail will place a significant operational burden on public health laboratories and their healthcare partners. Losing the use of the U.S. mail for transport of Category A infectious substances increases the turn around time for identification of causative disease agents for individual patients, which delays treatment and increases opportunities for disease transmission to the community.

For example, Alaska relies on the U.S. mail as the only source of transport for infectious substances (either Category A or B). Now, the only viable options are general cargo transport on commercial passenger airlines, which requires that a two day notice be given to place Category A infectious substances as general cargo, or use of commercial cargo carriers, such as FedEx and DHL. However, not all areas of the state have either option available.

The exclusive use of U.S. mail for Category A infectious substance transport is not limited to one geographic region of the U.S. Some states are also concerned about the

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impact of the regulation on their contact with tribal nations which routinely use the U.S. mail to transport cultures to the state public health laboratory for identification. Participation in public health laboratory programs involving surveillance of emerging infectious diseases will also decrease due to the fact that many, if not most, of those specimens were being transported by U.S. mail prior to the release of the interim final rule.

In addition to the operational burden, there will be an increase in cost involved in using alternative air transport. One estimate puts the average cost of mail transport of a Category A infectious substance at \$3 versus a higher initial cost of transport by a contract commercial carrier, such as FedEx, which also adds on an extra \$30 hazardous material handling fee. The increase in yearly transportation costs will likely lead to increases in costs to the individual seeking diagnostic services, government programs that subsidize patient costs, such as Medicare, and will have an impact on budgets for government programs.

Most commercial airlines in the US are members of the professional organization IATA, which complies with ICAO regulations for air transport. However, as a professional organization, IATA, allows its members to impose variations, which can include refusing to carry Category A infectious substances or requiring that all specimens from patients, including Category B infectious substances, be classified and packaged as Category A infectious substances. These variations have already had operational and fiscal impacts on the delivery of health care to isolated areas of the country. An exclusive reliance on the private sector for the transport of Category A infectious substances could lead to even greater increased costs related to public health care.

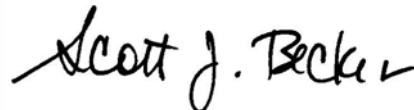
APHL recognizes that the U.S. Postal Service is an important partner to the public health system. In the interest of public health surveillance, disease prevention efforts, and preparedness, APHL recommends that the U.S. Postal Service accept Category A substances for transport, with the recognition that all current safety precautions provide protection for U.S. mail employees and others who come in contact with the mail.

Please contact Peter Kyriacopoulos at APHL at 240.485.2766 or peter.kyriacopoulos@aphl.org should you have any questions. Thank you.

Best regards,



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President, APHL



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