March 9, 2011

Francis S. Collins, MD, PhD
Director, National Institutes of Health
Building One, 126 Shannon
1 Center Drive
Bethesda, MD 20892

RE: Request for Extension to Comment Period for Proposed Adoption and Implementation of the Guide for the Care and Use of Laboratory Animals: Eighth Edition

Sent via electronic and U.S. Mail

Dear Dr. Collins:

On behalf of its more than 300 member institutions, many of which are affected Public Health Service (PHS)-assured institutions, the National Association for Biomedical Research (NABR) respectfully requests at least a thirty-day extension to the comment period provided by the NIH Notice, Laboratory Animal Welfare: Proposed Adoption and Implementation of the Eighth Edition of the Guide for the Care and Use of Laboratory Animals, published on February 24, 2011 (76 Federal Register 10379-80).

In order for institutions to adequately assess the substantive changes and additions to the Guide for the Care and Use of Laboratory Animals (Guide) and provide meaningful feedback regarding its impact on their animal care and use programs as requested, additional time is needed. The current timeframe set forth in the Notice is insufficient to accurately evaluate the consequences of NIH’s potential adoption and implementation of the Eighth Edition of the Guide as a basis for evaluation of institutional programs receiving or proposing to receive Public Health Service support for activities involving animals.

Furthermore, Executive Order 13563, issued January 18, 2011 (76 Federal Register 3821-23), states that in order to promote participation each agency “shall afford the public a meaningful opportunity to comment through the Internet on any proposed regulation, with a comment period that should generally be at least 60 days.” We believe that limiting the public comment period to thirty days is not in keeping with the spirit of OMB’s stated intentions to allow for meaningful public input. Therefore, NABR requests that the comment period for the subject Notice be extended at least until April 24, 2011, which would provide a more commonly accepted 60-day comment period.
I hope that the NIH will agree to our request to extend the deadline for comments. Thank you for your consideration and please contact me if you have any questions.

Sincerely,

Frankie L. Trull
President

cc: Patricia Brown, DVM
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