September 26, 2011

Daniel M. Ashe
Director, U.S. Fish and Wildlife Service
4401 N. Fairfax Drive, MS 2042-PDM;
Arlington, VA 22203

RE: Extension Request to Comment Period for Status Review to List Captive Chimpanzees (Pan troglodytes) as Endangered; Docket No. FWS-R9-ES-2010-0086

Sent via electronic and U.S. Mail and submitted at Regulations.gov

Dear Director Ashe:

On behalf of its member institutions, the National Association for Biomedical Research (NABR) respectfully requests an extension to the comment period regarding the Fish and Wildlife Service’s status review to determine if changing the listing status of captive chimpanzees from threatened to endangered is warranted, as published on September 1, 2011 (76 FR 54423). NABR represents more than 300 public and private universities, medical and veterinary schools, teaching hospitals, voluntary health organizations, professional societies, pharmaceutical and biotechnology companies and promotes sound public policy for the humane care and use of laboratory animals in biomedical research.

In order for our member institutions to assess the potential impact of changing the status of captive chimpanzees from threatened to endangered and gather the scientific and commercial information necessary to provide meaningful feedback as requested, additional time is needed. The current timeframe set forth in the Notice is insufficient to accurately evaluate the scientific evidence and consequences of changing the status of captive chimpanzees as it will preclude consideration of an ongoing Institute of Medicine (IOM) of the National Academies study regarding the current and anticipated use of chimpanzees in biomedical and behavioral research relevant to the mission of National Institutes of Health (NIH). At the request of three U.S. Senators and the NIH, the IOM undertook this study, in collaboration with the National Research Council, to determine if chimpanzees are or will be necessary for biomedical or behavioral research that will be needed for the advancement of the public’s health. The report, which Congress is “eagerly anticipating,” is expected to be released by the end of 2011.

1 http://www.iom.edu/Activities/Research/Chimpanzees.aspx
Therefore, NABR requests that the comment period for the subject Notice be extended at least until January 31, 2012.

I hope that the Fish and Wildlife Service will agree to our request to extend the deadline for comments. Thank you for your consideration of our request and please contact me if you have any questions.

Sincerely,

Frankie L. Trull
President

cc:

Gregory E. Siekaniec
Deputy Director for Policy, U.S. Fish and Wildlife Service
4401 N. Fairfax Drive, MS 2042-PDM;
Arlington, VA 22203