

**ABSA**

American Biological Safety Association

1200 Allanson Road • Mundelein, IL 60060-3808 • 866-425-1385 • 847-949-1517
Fax: 847-566-4580 • E-mail: absa@absa.org • Web Site: www.absa.org**President**

Benjamin A. Fontes, MPH, CBSP
Yale University
Office of EH&S, 1st Floor
135 College Street
New Haven, CT 06510
203-737-5009
Fax: 203-785-7588
benjamin.fontes@yale.edu

President-Elect

Karen B. Byers, MS, RBP, CBSP
Dana-Farber Cancer Institute
44 Binney Street—LGM 23
Boston, MA 02115
617-632-3890
Fax: 617-632-1932
karen_byers@dfci.harvard.edu

Secretary

Paul J. Meechan, PhD, RBP, CBSP
Centers for Disease Control and Prevention
Office of Health and Safety
CLFT, Bldg. 20, Room 2211, MS F05
Atlanta, GA 30329-4018
404-639-3147
Fax: 404-639-0883
pmeechan@cdc.gov

Treasurer

Rosamond Rutledge-Burns, MS, CBSP
National Institute of Standards & Technology
100 Bureau Drive, MS 1730
Building 301, Room B116
Gaithersburg, MD 20899-1730
301-975-5819
Fax: 301-975-4895
rburns@nist.gov

Past-President

Robert P. Ellis, PhD, CBSP
Colorado State University
Environmental Health Services
Campus Mail Stop 6021
Fort Collins, CO 80523-6021
970-491-6729
Fax: 970-491-4804
robert.ellis@colostate.edu

Councilors

LouAnn Burnett, MS, CBSP (10)
Michelle McKinney, CBSP (12)
Barbara Fox Nellis, RBP, CBSP (11)
Richard Rebar, RBP, CBSP (12)

2010 Biosafety Conference Chairpersons

Local Arrangements Committee
Lolly Gardiner, RBP
Scientific Program Committee
Richard C. Fink, CBSP
Robert A. Heckert, DVM, PhD, CBSP
Exhibitors Advisory Committee
Stephen Sowa, MS

Executive Director

Edward John Stygar, III, MBA, CAE
ed@absaoffice.org

Office of Biotechnology Activities
National Institutes of Health
6705 Rockledge Drive
Suite 750 MSC 7985
Bethesda, MD 20892-7985

August 10, 2010

Ladies and Gentlemen,

The American Biological Safety Association (ABSA) is an international group of biological safety professionals and is known as one of the world's foremost resources on biological safety practices. ABSA has reviewed the July 20, 2010 Federal Register announcement regarding the proposed exemption of well-characterized transgenic animals from the NIH Guidelines. Please consider these comments.

ABSA supports the proposed exemption. At BL1, the transgenic animals would still be contained in an animal care facility under the control of an institution. The containment afforded at this level should be sufficient to preclude the escape and possible breeding of transgenic animals with their feral counterparts. Retention of an Institutional Biosafety Committee registration requirement for certain breeding experiments described in the proposal would help manage possible breeding outcomes which may have biosafety ramifications. Even if exempt from the NIH Guidelines, some institutions may still choose to maintain their well-characterized transgenic animals in the manner currently specified under the NIH Guidelines in order to better account and care for these research animals.

We appreciate this comment opportunity for this proposed revision.

Sincerely,

Benjamin Fontes, MPH, CBSP
President
American Biological Safety Association