

AMERICAN MARITIME SAFETY, INC.
445 Hamilton Ave., 12th Floor
White Plains, NY 10601

<mailto:ams@maritimesafety.org>

January 15, 2010

Mr. Charles LoDico

M.S., D-ABFT
Drug Testing Team, DWP, CSAP
1 Choke Cherry Road, Room 2-1039
Rockville, MD 20857

Via e-mail: <mailto:charles.lodico@samhsa.hhs.gov>

Re: Notice of Proposed Revisions to the Federal Drug Testing Custody and Control Form

Dear Mr. LoDico,

American Maritime Safety, Inc. ("AMS") submits this position statement in response to the Department of Health and Human Services' ("HHS") request for written comments with regard to the notice in the Federal register on November 17, 2009, entitled "Proposed Revisions to Federal Drug Testing Custody and Control' Form."

AMS is a non-profit trade association established in 1987 to facilitate the maritime industry's compliance with the U.S. Department of Transportation's ("DOT") and the u.s. Coast Guard's ("USCG") chemical testing regulations, 49 CFR Part 40 and 46 CFR Part 4, 5 & 16. The AMS consortium administers a chemical testing program for a large segment of the deep-sea, Great Lake and tug & barge industries and conducts testing for over 40,000 seafarers pursuant to the DOT and USCG random chemical testing regulations.

AMS supports the proposed regulatory changes in their entirety. Specifically, AMS supports the inclusion of Step I(d), which is a new item listing the acronyms for the Federal testing authority under which the specimen is being collected. Moreover, we agree with the position that the identification of the Federal testing authority will facilitate reporting results to the USCG.

Please feel free to post these comments on the drug free workplace website.

Thank you for the time and consideration you have given this matter.

Sincerely,

Louis S. Meltz, Esq.
President
American Maritime Safety, Inc.

A non-profit, Tax Exempt 501(c)(6) Association
Tax ID #13-3522-279
Internet: <http://www.marilimesafety.org/>