

Alaska Airlines
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January 15, 2010

Robert L. Stephenson II, M.P.H.
Director, Division of Workplace Programs (DWP)
Center for Substance Abuse Prevention (CSAP)
1 Choke Cherry Road, Room 2-1035
Rockville, MD 20857

Via Email: <mailto:charles.lodico@samhsa.hhs.gov/>

Dear Mr. Stephenson,

This letter is to provide comment on the proposed revisions to the Federal Drug Testing Custody and Control Form. As the Manager of Drug Abatement and Designated Employer Representative (DER), I have responsibility for all drug and alcohol testing programs at Alaska Airlines. Alaska Airlines is an air carrier regulated by DOT/FAA. We currently employ approximately 10,000 employees, with approximately half being covered under our Federal drug and alcohol testing program.

The following are my comments on the proposed mandatory guidelines.

1. The newly proposed "step ID" as an additional step in the collection process is needless. The statistical reporting requirements of the FAA and other DOT agencies are currently achieved without this additional step on the CCF. While it would not be "difficult or impossible" to complete this new step, adding any additional check boxes will certainly lead to an increase in collector errors requiring corrections. Increasing collector errors is burdensome on employers, laboratories, MROs and TPAs who will need to spend additional time and money ensuring the accuracy of this additional step and seeking statements of correction from collectors. Based on current regulations, not obtaining a statement of correction for administrative errors would create a compliance issue during a DOT/FAA inspection. I urge you to only make changes to the CCF that simplify the collection process or increase its integrity and not choose to make changes for the purpose of data collection requirements that are already being fulfilled.

2. I would like to ask for the consideration to allow the use of "electronic" CCFs in addition to the traditional CCF. Inputting data electronically would allow the opportunity to increase the accuracy of the information entered on the CCF. Not only could errors in employer, employee, and collection site information be reduced by electronically populating these areas, other administrative errors due to collector oversight could be eliminated through programming that would not allow progression of the collection until all required information had been provided. Issues faced with illegible CCF copies

received via fax could be alleviated if the employer, laboratory, and MRO copies could be instantly distributed by secure email or other electronic means. Electronic CCFS also lends to the reduction of paper resources used.

Thank you for the opportunity to provide comment on the proposed revisions to the Federal Custody and Control Form.

Sincerely,

Michael Lockman
Manager, Drug Abatement