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January 18, 2010

Robert L. Stephenson II, MPH
Director, Division of Workplace Programs
Center for Substance Abuse Prevention
1 Choke Cherry Road, Room 2-1035
Rockville, Maryland
20857

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

Dear Sir:

The following comments are made with respect to the proposed revisions to the Federal Custody and Control Form:

1) Step IF. Drug Tests to be Performed

Since all specimens will now include testing for MDMA and 6-Acetylmorphine it would seem more appropriate that this line be reflective of the new panel of drugs and would read:

THC, COC, PCP, OPI, AMP, MDMA, 6-AM

2) Step 5A

From the perspective of the Certifying Scientists who report the drug analytes keeping the form as close as possible to the current form is practical.

Changing the descending order of Codeine, Morphine and 6-Acetylmorphine as it appears on the current form to 6-Acetylmorphine, Morphine and Codeine on the new form only disrupts a familiarity that seems to serve no real purpose.

Changing the descending order of Amphetamine and Methamphetamine as it appears on the current form to Methamphetamine and Amphetamine on the new form again just disrupts a familiarity that seems to serve no real purpose.

Ideally from a practical perspective I would like to see the descending order of the MDMA group to be MDA, MDMA and MDEA.

If you have any questions regarding these comments please contact me at your convenience.

Sincerely,

DynaLiFED,
Penny Colbourne, PhD, D-ABFT
Director, Substance Abuse Testing Laboratory