

ASPLUNDH
ASPLUNDH TREE EXPERT CO.
708 Blair Mill Road
Willow Grove, PA 19090

January 14, 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
<mailto:Charles.lodico@samhsa.hhs.gov>

Dear Robert,

Please consider these comments to the Department of Health and Human Services (HHS) Substance Abuse and Mental Services Administration's (SAMHSA) Notice of Proposed Revisions to Federal Chain of Custody Control (CCF) Forms found in the Federal Register November 17, 2009.

We are subject to federally regulated drug testing under 49 CFR Part 40; DOT's drug testing program. We urge HHS to implement an electronic CCF.

Paper custody and control forms (CCF) add costs and delays. We use eScreen's electronic custody and control form (eCCFTM) for our Non-DOT drug testing programs, and it is far superior. We have better access to our CCF copies and records, and we have no problems with illegible copies.

We have eliminated mountains of paper, filing and missing information with our eCCF. Our DOT program would greatly benefit from the use of an electronic CCF.

Sincerely,

Chad Kinney
Compliance Supervisor
Asplundh Tree Expert Co.
708 Blair Mill Road
Willow Grove, PA 19090