

January 14, 2010

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

Dear Mr. Stephenson:

We are writing this letter in response to the Department of Health and Human Services' *Notice of Proposed Revisions to the Federal Drug Testing Custody and Control Form (CCF)*, which was posted in the Federal Register on November 17, 2009.

Our company is subject to DOT-regulated drug testing, and we urge HHS to implement an electronic CCF. The use of paper CCFs contributes to unnecessary costs, delays and errors. By contrast, the use of an electronic version of the Federal CCF would eliminate the need to store forms, reduce the number of illegible copies, lower filing costs, improve compliance, and allow for better management of our drug testing program. Printing the CCF at the point of collection and capturing the donor and collector's signature electronically will streamline our program and improve compliance while simultaneously eliminating errors.

For the reasons outlined in this letter, we hope you will consider implementing an electronic CCF for DOT drug testing programs.

Sincerely,

G. Alan Leftwich  
Manager  
Corporate Risk  
National Oilwell Varco, L.P.  
7909 Parkwood Circle  
Houston, TX 77036