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DULUTH MISSABE AND IRON RANGE RAILWAY COMPANY

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PETER D. STEPHENSON
VICE PRESIDENT AND GENERAL MANAGER

October 23, 2002

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FBI - MINN

Docket Management Facility SVC-124
U.S. Department of Transportation
RM PL-401
400 Seventh Street, S. W.
Washington, DC 20590-0001

RE: DOCKET OST-2002-13435--4

We have reviewed the proposed rulemaking, which seeks to standardize the annual MIS forms used by transportation employees to report drug and alcohol testing activities.

The DM&IR currently submits our Drug and Alcohol Test information on a similar form. The proposed legislation will have limited effect. We believe an electronic version will improve the administrative process.

We support the **ODAPC** proposal to revise and standardize the form and provide an electronic reporting version.

Respectfully yours,



PDS:amm
odapc