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DEPT. OF TRANSPORTATION

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## NATIONAL CENTRAL PHARMACY

June 28, 2000

RSPA-99-6283-22

TO: Docket Management System  
US Department of Transportation  
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From: Steve Williamson  
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Re: RSPA-99-6283

The proposed regulation that would require placarding of all vehicles transporting W-I and Y-II would create many burdens on those associated with the delivery of RAM used in nuclear medicine, without any apparent improvement in safety. As you know, requiring a CDL for anyone transporting any labeled package would be a very significant change and expense in this area. The expense alone to each pharmacy and hospital for additional training, monitoring, maintaining a costly commercial drivers program at each facility and other work related requirements would add significantly to the cost of these nuclear medicine products. In addition, by limiting drivers to only those certified with a CDL, would create a burden on patients who need medication for an emergency scan, while time is taken in locating drivers and vehicles. Current regulations require training of all personnel handling/transporting RAM and this does seem sufficient for RAM used in nuclear medicine.

Sincerely,

Steve Williamson, RPH  
National Central Pharmacy