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DOCKETS MANAGEMENT SYSTEM
US DEPARTMENT OF TRANSPORTATION
400 SEVENTH STREET, SW
WASHINGTON, DC 20590-0001

June 28,2000

REGARDING: Proposed DOT regulation;

Reference number: RSPA-99-6283 -39

Dear Sirs,

I am an independent nuclear pharmacist, in business for over 10 years. I would like to address the proposed regulation by the Department of Transportation Research and Special Administration. Please note the impact that this proposal will have on a business such as mine.

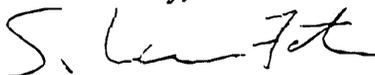
Competition in our field is very fierce. The independent pharmacy struggles everyday to compete with the national corporations. Our survival is dependant on our ability to do a better job and do that job with a much smaller profit margin than the large corporations.

We employ 8 to 10 delivery drivers at any one time. There is great care in employing only the most reliable people possible. Of the 8 to 10 drivers we employ, 4 or 5 are part time employees. Our hours of operation, 4a.m. - 4p.m., are not exactly the most sought after by potential employees. Keeping 8 to 10 good drivers is difficult, many of our employees are retired. To expect these people to have a commercial license would greatly reduce the number of employees available to us for hire. For a business our size, this would be a great burden to our potential growth. The increased salary this would create for a drivers position would be a great burden to our business, to say nothing of the yearly physicals and drug testing we would be responsible for.

Our transport of nuclear medicine consists of low level radiation delivered in syringe or capsule form, ready for injection when delivered. Our drivers are given special training, throughout the year, on the transport and safe handling of all radioactive containers. This training is documented and reviewed by several government agencies throughout the year. We have never had an accident with a spill or leak of any kind. Our containers are very safe, with little possibility of failure.

It is my sincere hope that you will carefully consider the impact this proposal will have on the nuclear pharmacy businesses in our country. To regulate us in this additional way, places too heavy a burden on an already heavily regulated industry. If I can answer any questions for your department or help with any other information, please let me know.

Sincerely,



S. Lamar Foti, RPh

President, Southeast Apothecary, Inc.