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DEPARTMENT OF TRANSPORTATION



**NuTech Inc.**

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Dockets Management System  
US Department of Transportation  
400 Seventh Street, SW  
Washington, DC 20590-0001

Reference: RSPA-99-6283 - 46

Dear Sirs:

I am writing to comment on proposed regulation changes that would require vehicles transporting W-1 or Y-II hazardous materials used in nuclear medicine procedures to conform to the same requirements currently imposed on transportation of Y-III packages.

As a nuclear pharmacist of 14 years, I can see no increase in safety to be gained from these changes. The most significant change will be the increased cost in diagnostic health care to patients. Currently, nuclear pharmacies leave the transport of Y-III packages to the large couriers like Federal Express. Individual deliveries to hospitals and clinics by pharmacies should not be grouped together in the same category as the more radioactive Y-III's.

I certainly hope you will not pass these regulations as currently proposed because of little or no benefit and increased cost to implement them.

Sincerely,

*Randall Yates*

Randall Yates, R.Ph., BCNP