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From: "Deniese Brown" <Deniese.Brown@coburgmilk.com>
To: <wvogl@samhsa.gov>
Date: 7/6/04 1:33PM
Subject: Fwd: Hair Testing Docket No. 04-7984

I am responsible for the drug testing program for over 300 employees in a manufacturing/distribution facility. Over 200 of those employees operate a DOT commercial vehicle. Our past policy was that ALL new hires, both DOT and non-DOT, had to undergo a hair drug test. DOT employees had to have the DOT required urine test as well, therefore hair and urine were conducted on drivers.

The results from 2003 speak for themselves. In 2003 we had 10 positive drug results just from our DOT new hires. Eight of those employees passed the urine test. If we had just performed the required urine drug testing for our new hires, we would have 8 drivers on the roads that most likely would be operating a commercial vehicle while under the influence of an illegal substance.

In 2004 we were acquired by a new corporation that does not perform hair drug testing and they have advised us to discontinue this program because it is not recognized by DOT.

I have seen the results first-hand and believe hair drug testing is a reputable program. I strongly recommend that hair drug testing (especially on new hires) be recognized by HHS and DOT to help keep commercial drivers off our highways that are using drugs.

Thank you for your concern.

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