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From: <EmilyW@brookshirebros.com>

To: <wvogl@samhsa.gov>

Date: 7/9/04 6:03PM

Subject: Comments on Oral Fluid Drug Testing

My name is Emily Watts and I am the Director of Personnel for a grocery company called Brookshire Brothers. We have 73 grocery stores, Pharmacies, Tobacco Barns and Conoco Gas Stations in Texas and Louisiana. We employ about 6000 people and our turnover rate is about 67%. We feel that there are several reasons why our turnover rate is so low in an industry that commonly has over 90% turnover. One of the main reasons is our success with our drug screening program. We use the Oral Intercept device for all pre-employment, random and post accident testing at all of our locations, except our Distribution Center with our DOT covered positions. They still use the old urine tests. We have had great success with the Oral tests and in 18 months of using theses tests we have only had 1 false positive. That's pretty amazing! I just wanted to share our success story with you as HHS considers alternatives to urine drug testing. Thank you.

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