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To: <wvogl@samhsa.gov>

Date: 7/10/04 6:00PM Subject: Drug testing rules

To Whom It May Concern:

As a practicing psychotherapist who has treated many patients suffering with paruresis (inability to urinate in the presence or anticipated presence of others), I want to urge that the new regulations reflect the reality of this problem. For anyone with this condition, sometimes called "pee shy" or "shy bladder," it can be a humiliating experience to be asked to urinate upon demand and not be able to do so. Worse, their inability to produce a urine sample for drug testing purposes may result in punishing consequences even though they are helpless in being able to comply with producing a sample.

The new regulations should allow drug testing by means other than urine samples for those who are paruretic through no fault of their own.

Sincerely, Christopher J. McCullough, Ph.D. 415-409-0181