

Dear Sir or Madam:

Kettering Medical Center is a community hospital with a PET center. We ship doses of F-18 Flurdeoxyglucose (FDG) to several local hospitals. The short physical half life of F-18 of 110 minutes dictates that suppliers must be close to local hospitals for daily shipments. The proposed changes to the DOT regulations would dramatically increase the cost of shipping to the local hospitals that receive our FDG. The increase in our shipping costs is estimated to be 2-3 times greater than the current costs. That is the increase would result in costs of \$150-225 for one shipment. These additional costs would be incurred by the local hospitals who receive our FDG. They in turn would have to charge their patients the additional amount for the shipping. Since often times just one dose is sent to a local hospital this additional expense would be incurred by just one patient.

Despite the additional cost of these proposed rules there is no apparent benefit in shipping safety for our radioactive packages. The implementation of the proposed rules may have a benefit on a global scale but at our local level the effect would be disastrous.

At a time when Medicare is underfunded a regulation which adds additional costs to a patient's study for no additional benefit is untenable. Please reconsider the implementation of these proposed regulations. At the very least exempt shipments of radioactive material labeled with a W-I, Y-II or Y-III label.

Thank you for your consideration.