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| Docket Operations, M-30Department of Transpiration1200 New Jersey Avenue, SERoom W 12-140West Building Ground FloorWashington, D.C. 20590-0001 | Submitted Electronically to: [www.regulations.gov](http://www.regulations.gov) |
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| RE: | Comments to [ANPRM: Drug and Alcohol Testing of Certain Maintenance Provider Employees Located Outside of the United States](http://www.regulations.gov/#!documentDetail;D=FAA-2012-1058-0001) (Docket No. FAA-2012-1058) |

To Whom It May Concern:

**[Company Name]** respectfully submits the following comments to the above referenced advance notice of proposed rulemaking (ANPRM).

**[Company Name]** operates **[a]** Federal Aviation Administration (FAA) certificated part 145 repair station**[s]** located in **[enter country(ies) where the company’s repair station faciliy(ies) is/are located]**.Consequently, this company would be directly affected by a rulemaking that imposes drug and alcohol (D&A) testing on non-U.S. based maintenance workers.

# Introduction

**[Summarize findings outlined below, or make other general comments not included in specific comments below.]**

# Current D&A Testing Practices and Data

**[For each facility, discuss the following—**

* **How many of the company’s non-U.S. based maintenance personnel perform safety-sensitive maintenance functions on aircraft operated by part 121 air carriers.**
* **How many, if any, are subject to D&A testing and what types of testing is performed, including whether the repair station is *required* to perform such testing or whether such testing is a *voluntary* repair station policy.**
* **How many drug and alcohol tests the facility performed over each of the last ten years and the number of positive results for each type of tests. Click** [**here**](https://s3.amazonaws.com/images.federalregister.gov/EP17MR14.004/original.png) **for an example of how to present the data.**
* **If the facility *does not* have a D&A testing program, state as much and describe internal policies used to deter the misuse/abuse of drugs and alcohol by repair station employees performing safety sensitive functions.**
* **If the facility *does* have a D&A testing program, describe the elements of that program, including who administers it (the company, third party, government official, etc.) and whether it includes pre-employment testing, random testing, testing after an accident, testing for reasonable cause/suspicion, and/or return-to-duty testing.]**

# D&A testing program costs

**[Discuss the following—**

* **What are/would be the cost per person for drug and alcohol tests and whether the costs would differ based on the type of test (i.e., pre-employment, post-accident, reasonable cause/suspicion, random, periodic, return-to-duty, follow-up, or confirmatory tests) or location.**
* **Costs associated with training, program and materials development, administration, travel, education, document retention, and the opportunity costs of employees missing work due to testing or travel to testing locations.**

# Conclusion

**[Summarize your position in light of the above information]**

Sincerely,

**[NAME]**

**[To file comments go to** [**http://www.regulations.gov/#!documentDetail;D=FAA-2012-1058-0001**](http://www.regulations.gov/#!documentDetail;D=FAA-2012-1058-0001) **and click the “comment now” button]**