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| Docket Operations, M-30Department of Transpiration1200 New Jersey Avenue, SERoom W 12-140West Building Ground Floor Washington, 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:

The **[Embassy/Entity Name]** respectfully submits the following comments to the above referenced advanced notice of proposed rulemaking (ANPRM).

We have **[enter number of part 145 certificated repair stations, found at** [**http://av-info.faa.gov/repairstation.asp**](http://av-info.faa.gov/repairstation.asp)**]** Federal Aviation Administration (FAA) certificated part 145 repair stations located within our nation. Consequently, we are deeply concerned about the agency’s intention to impose drug and alcohol (D&A) testing on non-U.S. based maintenance workers; the rulemaking referenced above will directly impact businesses governed by **[country name].**

# Introduction

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

# Response to specific ANPRM queries

## What laws and regulations—including those concerning privacy and employment—may impact implementation of a drug and alcohol testing program for employees?

**[Discuss the following—**

* **What types of D&A testing is required, permitted, and prohibited? Include discussions regarding pre-employment testing, random testing during employment, periodic testing during employment, testing based on reasonable/suspicion of drug or alcohol misuse, post-accident testing, return-to-duty, follow-up testing of individuals who have previously tested positive for alcohol or drugs, and any other forms of testing.**
* **Who administers the program? Address whether private companies are allowed to drug test, whether a third-party administrator is required, or if only the government is permitted to perform D&A testing.**
* **Reference the applicable laws/regulations and, if available, include an English version as an appendix.]**

## What laws and regulations govern drug and alcohol testing of aviation personnel?

**[Discuss the following—**

* **What categories of aviation personnel currently subject to testing (*e.g.*, pilots, flight attendants, maintenance personnel, flight dispatchers, other categories)?**
* **Under what circumstances may they may be tested (*e.g.*, pre-employment, random testing during employment, periodic testing, testing based on reasonable cause/suspicion, post-accident testing)?**
* **Who is the governmental/regulatory/administrative body responsible for overseeing the testing?**
* **Reference the applicable laws/regulations and, if available, include an English version as an appendix.]**

## If drug and alcohol testing is generally prohibited, or if random drug and alcohol testing is prohibited, are there exceptions to the prohibition and what other methods could be used (or are used) to deter the misuse/abuse of drugs and alcohol (counseling, awareness campaigns, etc.)?

**[Discuss the following—**

* **What specific law, regulation, or policy prohibits drug and alcohol testing and are there any exceptions thereto?**
* **Are there any examples of government programs or private efforts to deter employees’ misuse/abuse of drugs and alcohol while performing safety sensitive duties?**
* **Reference the applicable laws/regulations/policies and, if available, include an English version as an appendix.]**

## What drugs are most pervasively misused in your country?

**[Discuss the following—**

* **What drugs are most abused in your country?**
* **At what concentration is a drug or alcohol test considered “positive” for drug and alcohol use?**
* **If drug and alcohol testing is prohibited, what other means are used to detect drug and alcohol use?**
* **Reference the applicable laws/regulations/data and, if available, include an English version as an appendix.]**

# 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]**