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Federation of American Societies for Experimental Biology

----*Quality Life Through Research*----

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Share-My-Mouse

NSC

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The Federation of American Societies for Experimental Biology (FASEB) appreciates the opportunity to comment on the May 28, 2003 draft NIH Statement on Sharing and Distributing Mouse Resources. FASEB is comprised of 22 societies with more than 60,000 members, making it the largest coalition of biomedical research associations in the United States. The mission of FASEB is to enhance the ability of biomedical and life scientists to improve, through their research, the health, well-being and productivity of all people.

As scientists, we endorse the philosophy that the open dissemination of research tools and resources will best advance the interests of science and society. We recognize that we have an obligation to share in a timely fashion "mouse resources" generated with the aid of NIH funding, including "genetically modified mice, inbred mouse strains, mutagenesis protocols, as well as DNA vectors and murine embryonic stem cells used in the production of knockout mice."

The NIH proposed policy would require investigators to include within an NIH application a concise plan to distribute mouse resources after publication in a peer-reviewed journal if the proposed research will generate mouse resources. We agree with the NIH that in most cases this plan will be to respond to requests from other laboratories to provide the resources, or alternatively to place the mouse strain in a mutant mouse repository.

The proposed policy guidelines quite appropriately allow for the Requesting Investigator to assume all shipping costs in those situations where the mutant strains are requested from a Donating Investigator. However, there are costs of sharing these resources in addition to shipping costs, such as costs associated with specialized mouse breeding and animal health monitoring. We recommend that the guidelines be amended to contain an equitable method for rapid funds to be made available to support *all* the reasonable costs of distribution of *all* mouse strains and stocks. It could be a set aside program in which the most relevant Institutes pool funds and set up a method to apply for funds covering the actual cost of maintaining and providing the mice. Alternatively, a policy could be developed

allowing the Donating Investigator to calculate charges and pass the full costs on to the requesting investigators. In addition, the guidelines should provide that a Requesting Investigator be required to post a deposit or prepayment prior to fulfillment of a request by a Donating Investigator.

The sharing of research resources is a paramount concern to researchers. While it is important to promote the obligation to share mouse resources, it is crucial that a workable sharing plan be compatible with protecting the proprietary rights of both institutions and inventors. We are pleased that the NIH Example of Mouse Sharing Plan provides that transfers of mouse resources should be made in conformance with the NIH Grants Policy on Sharing of Unique Research Resources including the "Sharing of Biomedical Research Resources: Principles and Guidelines for Recipients of NIH Grants and Contracts" issued in December, 1999 (http://ott.od.nih.gov/NewPages/Rtguide_final.html) with no more restrictive terms than in the Simple Letter Agreement or the UBMTA provided in said policy.

The American people have been extraordinarily generous in support of research, and we are privileged to pursue scientific opportunities at the behest of the public and for the benefit of the public. The sharing of mouse resources provides more effective use of public resources. Scientists, along with the public, are the principal beneficiaries of this sharing which lessens the duplication of expensive activities and frees time and money for research into new areas of scientific inquiry. Again, thank you for giving us the opportunity to provide input into the policy for Sharing and Distributing Mouse Resources prior to its adoption.

Sincerely,

Robert D. Wells, Ph.D.
President, FASEB