703 comments were received for the ANPRM. This Matrix compiles the comments from dockets FMCSA-2015-0419 and FRA-2015-0111. The first section includes comments from medical and scientific professionals, organizations, or similar commenters. The second section includes comments from stakeholders, which includes labor and industry organizations.

The 77 comments address four topics which are listed in the “Comment Topic” column and are coded as follows:

* C – Cost
* D – Diagnosis
* S – Screening
* T – Treatment

15 commenters attached various articles or studies. The “Comment Topic” column lists the number attachments the commenter provided. The column labeled “Comment Links” provides a link to each comment including any attached studies or articles provided by the commenter. The following codes apply:

* Q-ANPRM – Responses to ANPRM questions
* OAT – Oral Appliance Therapy

The column labeled “Agency” indicates the docket to which the comment was posted. It does **NOT** indicate which agency the commenter intended to address. There are comments on both dockets intended for the other agency.

Comments duplicated on the same docket appear only once in this matrix.

***Comments in bold italics appear in both FMCSA-2015-0419 and FRA-2015-0111. The number in the far left column indicates the comment number in the corresponding docket.***

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| **COMMENTS OF MEDICAL AND SCIENTIFIC PROFESSIONALS** | | | | | | |
| FMCSA | 0126 | | Gerald Lebel, RN, NP | S | [Screening Tool](https://www.regulations.gov/document?D=FMCSA-2015-0419-0126) |  |
| FMCSA | 0146 | | * Christine Allman, RN | SDTC | [Offering recommendations on SDTC and education](https://www.regulations.gov/document?D=FMCSA-2015-0419-0146) |  |
| ***FMCSA*** | ***0155*** | | * ***Richard Reichman, DDS*** | TC | [Experienced based observations](https://www.regulations.gov/document?D=FMCSA-2015-0419-0155) | ***0023*** |
| FMCSA | 0156 | | * Erin Elliott, DDS | T (4 attachments) | [Health Outcomes CPAP vs. OAT](https://www.regulations.gov/document?D=FMCSA-2015-0419-0156) |  |
| FMCSA | 0210 | | * Calvin Channell, MD | ST | [Experience based recommendations/observations](https://www.regulations.gov/document?D=FMCSA-2015-0419-0210) |  |
| FMCSA | 0215 | | * Stephen Carstensen, DDS | T (1 attachment) | [Supports OAT](https://www.regulations.gov/document?D=FMCSA-2015-0419-0215) |  |
| ***FMCSA*** | ***0221*** | | ***Jay Wright, DDS*** | SDT *(*4 attachments) | [Supports OAT; consensus studies, parameters](https://www.regulations.gov/document?D=FMCSA-2015-0419-0221) | ***0027*** |
| FMCSA | 0244 | | * Paul Serrano, DDS | TC | [References listed to support OAT efficiency](https://www.regulations.gov/document?D=FMCSA-2015-0419-0244) |  |
| ***FMCSA*** | ***0286*** | | * ***Ronald Shelley, DMD*** | T | [Urging support of OAT with references](https://www.regulations.gov/document?D=FMCSA-2015-0419-0286) | ***0031*** |
| ***FMCSA*** | ***0288*** | | * ***Paul Kenworthy, DMD*** | T (7 attachments) | [OAT effectiveness and efficiencies](https://www.regulations.gov/document?D=FMCSA-2015-0419-0288) | ***0033*** |
| ***FMCSA*** | ***0289*** | | * ***Rashmi Parmar, DDS*** | T | [Supports OAT as alternative to CPAP](https://www.regulations.gov/document?D=FMCSA-2015-0419-0289) | ***0030*** |
| FMCSA | 0293 | | * Robyn Woidtke, RN | S | [Urges inclusion of case management for compliance/proper medical qualifications](https://www.regulations.gov/document?D=FMCSA-2015-0419-0293) |  |
| ***FMCSA*** | ***0301*** | | * ***Richard Bonato, PhD*** | T (1 attachment) | [Supports OAT](https://www.regulations.gov/document?D=FMCSA-2015-0419-0301) | ***0063*** |
| ***FMCSA*** | ***0309*** | | ***Rebecca Lauck, DDS*** | T | [Supports OAT References listed](https://www.regulations.gov/document?D=FMCSA-2015-0419-0309) | ***0047*** |
| ***FMCSA*** | ***0320*** | * ***Elliot Alpher, DDS*** | | T (24 attachments) | [Supports OAT multiple; physiological impacts OAT, 4 yr. follow up, surgical effects, etc.](https://www.regulations.gov/document?D=FMCSA-2015-0419-0320) | ***0051*** |
| FMCSA | 0321 | * Chris Haik | | S (3 attachments) | [Pulse Ox; STOP BANG](https://www.regulations.gov/document?D=FMCSA-2015-0419-0321) |  |
| FMCSA | 0333 | American College of Chest Physicians (CHEST), Jennifer Nemkovich | | SDTC | [Q-ANPRM](https://www.regulations.gov/document?D=FMCSA-2015-0419-0333) |  |
| FMCSA | 0369 | * Richard Klein, MD | | T | [Crash risk w/drivers w/non-adherence to treatment for OSA](https://www.regulations.gov/document?D=FMCSA-2015-0419-0369) (Listening Session Comment) |  |
| FMCSA | 0370 | Chris Chui, DDS | | T | [Supports OAT](https://www.regulations.gov/document?D=FMCSA-2015-0419-0370) |  |
| ***FMCSA*** | ***0429*** | ***American Academy of Sleep Medicine (AASM), Ted Thurn*** | |  | [Q-ANPRM](https://www.regulations.gov/document?D=FMCSA-2015-0419-0429) | ***0065*** |
| FMCSA | 0432 | Brigham and Women’s Hospital, Harvard Medical School, Stefanos N. Kales, MD | | SDT (12 attachments) | [Q-ANPRM and various studies](https://www.regulations.gov/document?D=FMCSA-2015-0419-0432) |  |
| FMCSA | 0433 | * Jose Jeune, MD | | S | [Supports OSA guidelines Establish predictive parameters for further evaluation(References listed)](https://www.regulations.gov/document?D=FMCSA-2015-0419-0433) |  |
| FMCSA | 0443 | * US HealthWorks, Mark Pueck, MD | | S (1 attachment) | [US Healthworks OSA risk screening protocol](https://www.regulations.gov/document?D=FMCSA-2015-0419-0443) |  |
| ***FMCSA*** | ***0444*** | ***Joel Nathanson, DDS*** | | T (2 attachments) | [Health Outcomes CPAP vs OAT, Study CV mortality in OSA w/either CPAP or OAT](https://www.regulations.gov/document?D=FMCSA-2015-0419-0444) | ***0068*** |
| FMCSA | 0456 | * American Sleep Apnea Association, Darrel Drobnich | | SDT (6 attachments) | [Supports JointTask Force recommendations; COPD, JOEM articles on OSA](https://www.regulations.gov/document?D=FMCSA-2015-0419-0456) |  |
| FMCSA | 0461 | Lehigh Valley Health Network HealthWorks Occupational Health Kevin Vrablik, MD | | SDT | [Results of office study done on sampling of CMV driver patients](https://www.regulations.gov/document?D=FMCSA-2015-0419-0461) |  |
| FMCSA | 0462 | * Thomas Armstrong, DDS | | DT (3 attachments) | [Health Cost Saving in tx’d drivers; Price of Fatigue; What Employers Should Know](https://www.regulations.gov/document?D=FMCSA-2015-0419-0462;) |  |
| ***FMCSA*** | ***0464*** | ***American Sleep Apnea Society Michael Morgenstern*** | | S (1 attachment) | [White Paper “Screening for OSA in Railway Personnel”](https://www.regulations.gov/document?D=FMCSA-2015-0419-0462) | ***0067*** |
| FMCSA | 0470 | Mark Katz, DDS | | T (4 attachments) | [Wisconsin Sleep Cohort Study, National Prevention Report, AASM 2015 Clinical Guidelines for OAT](https://www.regulations.gov/document?D=FMCSA-2015-0419-0470) |  |
| FMCSA | 0473 | * Rodney Willey, DDS | | T (3 attachments) | [CPAP and Oral Appliance Efficacy European Study; Oral Appliance Treatment; Health Outcomes CPAP vs Oral](https://www.regulations.gov/document?D=FMCSA-2015-0419-0473) |  |
| ***FMCSA*** | ***0474*** | ***Daniel Babiec, DMD*** | | SDT | [Supports Screening and Dx of all employees- References listed](https://www.regulations.gov/document?D=FMCSA-2015-0419-0474) | ***0083*** |
| ***FMCSA*** | ***0478*** | ***ResMed Corp., Larissa DAndrea*** | | SDT | [Q-ANPRM](https://www.regulations.gov/document?D=FMCSA-2015-0419-0478), Questions 2,7,9-10,13 | ***0072*** |
| FMCSA | 0479 | * SomnoMed, Tom Cavitt | | SDTC | [Q-ANPRM](https://www.regulations.gov/document?D=FMCSA-2015-0419-0479) |  |
| FMCSA | 0493 | * Hoa Tran, MD | | SDTC | [Q-ANPRM](https://www.regulations.gov/document?D=FMCSA-2015-0419-0493), Questions 1,4,5,9-11,13,14,16,18-20 |  |
| FMCSA | 0536 | * American Association of Sleep Technology, Richard Rosenberg | | SDT | [Supports Joint Task Force recommendations](https://www.regulations.gov/document?D=FMCSA-2015-0419-0536) |  |
| FMCSA | 0542 | Board of Registered Polysomnographic Technologists Jessica Schmidt | | SDT | [Supports a rule; Offers collaboration](https://www.regulations.gov/document?D=FMCSA-2015-0419-0542) |  |
| FMCSA | 0556 | * Thomas M. Horiagon, MD | | SDT | [Q-ANPRM](https://www.regulations.gov/document?D=FMCSA-2015-0419-0556) |  |
| FMCSA | 0583 | * Precision Pulmonary Diagnostics, LLC, Mark Berger, MD | | SDT | [Q-ANPRM](https://www.regulations.gov/document?D=FMCSA-2015-0419-0583) |  |
| FMCSA | 0589 | Urgent Care Association of America Geoff Werth | | SDTC | [Q-ANPRM,](https://www.regulations.gov/document?D=FMCSA-2015-0419-0589) Questions 5,7,9,11,13,14,16,20 |  |
| FMCSA | 0599 | American College of Occupational and Environmental Medicine Patrick Connor | | SDTC | [Q-ANPRM](https://www.regulations.gov/document?D=FMCSA-2015-0419-0599) |  |
| FRA | 0073 | Robert Rudowski, DDS | | SD | [Supports mandatory screening and encourages use of home sleep studies](https://www.regulations.gov/document?D=FRA-2015-0111-0073) |  |
| ***FRA*** | ***0081*** | ***Mayo Clinic, Clayton Cowl*** | | SD | [Q-ANPRM](https://www.regulations.gov/document?D=FMCSA-2015-0419-0440), Questions 1-3 | ***0440*** |
| FRA | 0092 | * American Association of Nurse Practitioners, David Herbert | | SDTC | [Supports more concrete rules/guidelines for medical providers](https://www.regulations.gov/document?D=FRA-2015-0111-0092) |  |

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| **COMMENTS OF LABOR AND INDUSTRY STAKEHOLDERS** | | | | | |
| **Agency** | **Comment Number** | **Organization** | **Comment Topic** | **Comment Links** | **Duplicate** |
| FMCSA | 0371 | Truck Safety Coalition, Tami Friedrich Trakh | ST | [Supports rulemaking-provides a personal account concerning a crash and OSA](https://www.regulations.gov/document?D=FMCSA-2015-0419-0371) |  |
| FMCSA | 0409 | National Transportation Safety Board, Christopher Hart, Chairman | SDT | [Q-ANPRM](https://www.regulations.gov/document?D=FMCSA-2015-0419-0409), Questions 3,4,7,11-13,15-18,20 | **0060** |
| FMCSA | 0458 | Virginia Tech Transportation Institute Center for Truck and Bus Safety, Erin Mabry, MD | SDTC | [Q-ANPRM](https://www.regulations.gov/document?D=FMCSA-2015-0419-0458) |  |
| FMCSA | 0459 | Advocates for Highway & Auto Safety, Peter Kurdock | SDT | [Discusses benefits of regulatory action on driver fatigue and crash risk](https://www.regulations.gov/document?D=FMCSA-2015-0419-0459) |  |
| FMCSA | 0561 | Owner Operator Independent Drivers Association, Todd Spencer | S (3 attachments) | [Q-ANPRM](https://www.regulations.gov/document?D=FMCSA-2015-0419-0561) |  |
| FMCSA | 0569 | * Truckers for a Cause, Bob Stanton | SDTC | [Q-ANPRM](https://www.regulations.gov/document?D=FMCSA-2015-0419-0569) |  |
| FMCSA | 0577 | * American Trucking Associations, Megan Bush | SC | [Supports rule but should be evidence-based](https://www.regulations.gov/document?D=FMCSA-2015-0419-0577) |  |
| FMCSA | 0578 | * The International Brotherhood of Teamsters, Kelice Bellamy | STC | [Q-ANPRM](https://www.regulations.gov/document?D=FMCSA-2015-0419-0578), Questions 2,6-7,9-10 |  |
| FMCSA | 0580 | * AFL CIO, Transportation Trades Department, Edward Wytkind | STC | [Supports addressing OSA in initiatives designed to address fatigue; Non-support of separate FRA and FMCSA rulemaking](https://www.regulations.gov/document?D=FMCSA-2015-0419-0580) |  |
| FMCSA | 0582 | * American Public Power Association, Edison Electric Institute, National Rural Electric Cooperative Association, and Electric Utility Trade Association, Martha Duggan | SC | [Non-support of Utility workers being included in rulemaking. Request clear distinction is made in the rule](https://www.regulations.gov/document?D=FMCSA-2015-0419-0582) |  |
| FMCSA | 0586 | * United Motorcoach Association, Ken Presley | ST | [Supports evidence-based rulemaking; concerned about regulatory over reach](https://www.regulations.gov/document?D=FMCSA-2015-0419-0586) |  |
| FMCSA | 0592 | * Truckload Carriers Association, John Lyboldt | TC | [Supports programs that lead to overall lifestyle changes; includes demographic and historical data discussion](https://www.regulations.gov/document?D=FMCSA-2015-0419-0592) |  |
| FMCSA | 0598 | * Congresswoman Anna Eshoo, Congressman Sam Farr, and Congressman Michael M. Honda | T | [Encouraging that all different methods of treatment receive equal evaluation](https://www.regulations.gov/document?D=FMCSA-2015-0419-0598) |  |
| FMCSA | 0594 | * Amalgamated Transit Union, Keira McNett | SC | [Believes OSA must be considered in broader area of fatigue](https://www.regulations.gov/document?D=FMCSA-2015-0419-0594) |  |
| ***FRA*** | ***0001*** | * ***Metropolitan Transportation Authority of New York, Crystal Cummings*** | SDTC | [**Q-ANPRM**](https://www.regulations.gov/document?D=FRA-2015-0111-0111) |  |
| FRA | 0088 | * Association of American Railroads, Sarah Yurasko | SDC | [Discusses SDC specific to rail systems](https://www.regulations.gov/document?D=FRA-2015-0111-0088) |  |
| FRA | 0093 | * American Association for Justice, Zoe Oreck | SDT | [Supports screening testing and tx](https://www.regulations.gov/document?D=FMCSA-2015-0419-0093) |  |
| FRA | 0094 | * Brotherhood of Maintenance of Way Employees, Mike Gekas | SDTC | [Q-ANPRM](https://www.regulations.gov/document?D=FRA-2015-0111-0094), Questions 4,9,17 |  |
| FRA | 0107 | * Brotherhood of Locomotive Engineers and Trainmen, Dennis Pierce | SDTC | [Recommends studying existing drivers for crash risk](https://www.regulations.gov/document?D=FRA-2015-0111-0107) |  |
| FRA | 0110 | * American Bus Association, Brandon Buchanan | SDT | [Urges bifurcating the rulemaking process and evidence based rulemaking](https://www.regulations.gov/document?D=FRA-2015-0111-0110) |  |