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October 7, 2016

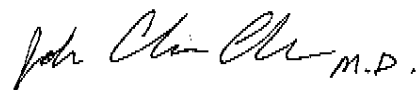
The Honorable Shaun Donovan
Director, The Office of Management and Budget
725 17th Street, NW
Washington, DC 20503

Dear Mr. Donovan,

I write to urge you to exclude peripheral blood stem cells from the definition of bone marrow under §301 of the National Organ Transplantation Act of 1984. The U.S. Department of Health and Human Services has proposed a rule which would reclassify peripheral blood stem cells as bone marrow. Bone marrow is defined as an organ under the National Organ Transplant Act.

Peripheral blood stem cells have left the bone marrow and thus are no longer part of the bone marrow, but rather peripheral blood cells much like peripheral red blood cell, white blood cells, and platelets, none of which are classified as bone marrow. It is my medical opinion that peripheral blood stems cells are not bone marrow.

Sincerely,

A handwritten signature in black ink, appearing to read "John Clayton Allen, M.D.", with a stylized flourish at the end.

John Clayton Allen, M.D.
American Board of Internal Medicine, Certified