

The AST Board of Directors approved the following responses to the OPTN/UNOS Special December 2019 Public Comment period via email. The response was developed after review of feedback from the Society's Communities of Practice and Policy Committee leadership.

The American Society of Transplantation is generally supportive of the proposal as written but offers the following comments. The Society believes that it will be important for the OPTN to be transparent in showing the impact of the AC model on other mainland centers who may be disadvantaged by it. It was suggested that based on the historical data for Puerto Rico, a cut-off distance of 1,100 NM would exclude 13 of the 23 mainland liver allografts they utilized from 2012-2017 but increasing that to 1,600 NM would allow access to allografts they have utilized under regional sharing. However, the impact of this larger distance on the mainland centers also needs to be considered.