The American Society of Transplant Surgeons (ASTS) appreciates the effort of the OPTN/UNOS Liver and Intestine Transplantation Committee in response to the HHS Secretary’s directive on designing an allocation system that removes the DSA as a unit of organ distribution. ASTS supports the goal to build a system structured on a population based model that can be adjusted incrementally to minimize unintended consequences and to fit the needs of the community. This will also allow assessment of other ongoing system changes, including implementation of the National Liver Review Board (NLRB). We recommend the committee reference the framework for organ allocation and work done previously on liver distribution. ASTS also encourages additional study on the impact of distribution circles on listed patient survival, transplantation rates, and the impact of transplant Meld, increased travel on success rates and associated costs. While there are no easy answers, we are grateful for the opportunity to share in designing a new process focused on the common good.