



12575 W. Bayaud Avenue
Lakewood, Colorado USA 80228

Mailing Address: P.O. Box 150899
Denver, Colorado USA 80215-0899

303/986-2800
FAX: 303/986-1700
1-800-252-2242

JOHN W. ALBERS, DVM
Executive Director

November 9, 1999

Docket No. 99-040-1
Regulatory Analysis and Development,
PPPD. APHIS
Suite 3C03
4700 River Road, Unit 118
Riverdale, MD 20737-1238

**Re: Docket Number 99-040-1
Viruses, Serums, Toxins, and Analogous Products; Definitions**

The American Animal Hospital Association would like to comment on Docket Number 99-040-1 for the proposed rulemaking by APHIS (USDA), regarding Viruses, Serums, Toxins, and Analogous Products; Definitions. AAHA is an international organization of more than 16,000 veterinary care providers who treat companion animals. Established in 1933, the American Animal Hospital Association is well known among veterinarians for its high standards for veterinary hospitals. AAHA member hospitals are the largest and most progressive group of companion animal veterinarians, providing the highest quality of veterinary care.

We at AAHA support amending the Virus-Serum-Toxin Act regulations to add a definition of the term dog to include all members of the species *Canis familiaris*, *Canis lupis* (grey wolf), or any dog-wolf cross. This would allow canine vaccines to be recommended for use in wolves and dog-wolf crosses. Legal vaccines have been needed for these animals, which may be owned by and come in contact with humans, in order to protect the health of the general public, as well as the animals themselves. There does seem to be ample evidence available to substantiate the relationship and similarities of these animals as well as the likelihood of similar immune system responses to vaccine challenge. This proposal seems to be a responsible step in the clarification of how to meet the management needs of wolves and wolf-hybrids and what immunogenic products are most appropriate for that task. This action could provide official recognition of the need for the vaccination of these animals and would clear up a gray area, which now exists, in the use of vaccines and the enforcement of vaccination requirements.

However, even though we support this proposal which would legalize the use of canine vaccines in wolves and wolf-hybrids, AAHA has serious concerns regarding the keeping of these animals, as well as other wildlife, as pets. Although dogs, wolves and wolf-hybrids may be genetically similar, they are not as domesticated as the dog and may pose behavioral challenges. Therefore,

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wolves and wolf-hybrids may pose a special risk for human bites beyond that of the average dog. This proposal may increase the acceptance for ownership of wolves and wolf-hybrids by the general public, which may not be safe, or in the best interest of society. We do have concern with the individual ownership of non-domesticated animals such as these.

The American Animal Hospital Association thanks you for allowing us this opportunity to comment. If we can be of any assistance, please contact Dr. Janice Trumpeter at 303-986-2800 or janice.trumpeter@aahanet.org.

Sincerely,

A handwritten signature in cursive script that reads "John W. Albers".

John W. Albers, DVM
Executive Director