



Diane Delbridge, D.V.M.

99-040-1

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October 5, 1999

Regulatory Analysis and Development
PPD, APHIS, Suite 3C03
4700 River Road, Unit 118
Riverdale, MD 20737-1238

Dear Sirs,

These comments are in reference to Docket No 99-040-1. I am very pleased to see the proposed change in the Virus Serum Toxin Act to allow wolves and wolf-dog crosses to be legally vaccinated with the same vaccines currently approved for dogs. As a veterinarian, part of my job is to protect the public health by vaccination of pets against rabies. The way the law currently stands, there is a certain segment of the pet population that is left unprotected, thereby increasing the risk of rabies exposure to their owners. It is fortunate that we have had only one case of rabies in a wolf-dog cross, but it will be safer for the animals and the owners to see that these animals are properly vaccinated.

The second issue is the protection of the animals themselves, both from the disease itself and from the automatic death sentence should they be involved in a bite. I also believe that more of these animals will be properly vaccinated for distemper and parvovirus at the same time as their rabies vaccination. Plus they will have much better overall health care due to the annual health exam performed by the veterinarian prior to vaccine administration.

Veterinarians who work in zoos have been vaccinating wolves for all the common canine diseases for years, based almost entirely on anecdotal evidence that no harm was done, and that the animals seemed to be protected. It is good to see that data was collected on a large number of animals to confirm the anecdotal evidence. It is also gratifying to see that no additional animals had to be sacrificed in vaccine trials that would only have been a repeat of tests previously conducted on dogs of other breeds. New trials would have been a mere formality, to all but the wolves in the control group, anyway.

I heartily agree with the proposed rule change to allow vaccination of wolves and wolf-dog crosses. Thank you for your efforts in this matter.

Sincerely,

Diane Delbridge, DVM

