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**Docket No. 99-040-1** allowing relabeling of canine biologicals for use in wolves all dog/wolf crosses.

I am totally **IN FAVOR OF THE PROPOSED CHANGES** for the following:

- 1.) As stated in the docket there is good genetic evidence that wolves and dogs are the same species and have been reclassified as such by the American Society of Mammalogists in 1994. The well known canine evolutionary biologist Robert Wayne in an article describing the relationship of dogs and wolves said, "Dogs are grey wolves, despite their diversity in size and proportion; the wide variation in their adult morphology probably results from simple changes in developmental rate and timing". More recent molecular genetic studies have revealed that it is difficult to separate dogs and wolves in evolution. Dogs and wolves have more common genetic identity than do races of humans, so it makes no sense to separately regulate their biologicals.
- 2.) There are estimated 100,000 to 2 million wolfdogs being kept in the United States as companion animals. The denial of rabies vaccination to these animals, based on the non-approval of the vaccine, has likely created a pool of companion animals that are not vaccinated against rabies. Since this fatal disease is epidemic in wild animals, particularly on the east coast, it is imperative that all dogs and cats be vaccinated. Because previously vaccinating a wolfdog against rabies was considered an off label use, and the Rabies Compendium has in the past recommended against vaccination of wolfdogs, veterinarians have been reluctant to vaccinate alleged wolfdogs. Relabeling the vaccine for use in wolves and wolfdogs will avert a potentially devastating human health hazard.
- 3.) Since there is no way currently to tell if an animal is a wolfdog cross, it is up to the owner to label their canine as a wolfdog. There probably many animals sold as wolfdogs, recommendations against vaccinating them for rabies, and training advice difficult to attain, many wolfdog owners are "underground". Thus, many wolfdogs in the United States that are being labeled on official documents by their owners as dogs while other dogs are being labeled as wolfdogs. Since a veterinarian can't use the rabies vaccine for legal purposes (e. g. licensing) on a wolfdog, there are dogs that are being denied vaccinations. And since many wolfdogs are officially labeled as dogs, there are wolfdogs that are being vaccinated. This state of affairs makes no biological sense. Because the scientists of the April 1996 advisory committee unanimously agreed that dog biologicals would be fine for use in wolves and wolfdogs, allowing this change would even out the uneven treatment of companion canines by the veterinary establishment and improve public health in the long run.

Lynn D. Andrade  
President MedCon LLC

*Lynn D. Andrade* 9-30-99

