

Ronald T. West

Attorney at Law

1141 West 79th Avenue • Anchorage, Alaska 99518
907-522-1312



November 2, 1999

Regulatory Analysis and Development
PPD, APHAS, Ste. 3C03
4700 River Road, Unit 118
Riverdale, MD. 20737-1238

RE: Docket No. 99-040-1, USDA Proposal For Wolf/Wolfdog Vaccine Approval

To Whom It May Concern:

We support the proposed change of 9 CFR 113.209, as published in the Federal Register on September 28, 1999. The change is long overdue. States, cities, and counties presently force wolf-dog/ wolf owners to prove a double negative: that the present vaccine does not work. There is no logic to the proposition. The vaccine works against all known canids.. The rabies litters / antibodies are produced, in wolf/wolf-dogs. There are no known instances of world/wolf dogs becoming rabid after inoculation. In Anchorage, there are many wolf-mix dogs. The last known instance of rabies was, we believe, in the 1920's, and did not involve wolf-mix canids. Rabies occurs in rural areas, but not among wolves. We contacted the US Fish and Wildlife agency some time ago, about inoculation of wolves reintroduced in South Carolina and were told they had no problem with the vaccine available.

We urge the amended regulation be adopted. The present test employed in Alaska is to kill the animal and test its brains. It is barbaric. No animal so tested has been found to have rabies.

Very truly yours,

Ronald T. West *Christine Gibbs*

Ronald T. West/Christine Gibbs
1141 W. 79th Avenue
Anchorage, Ak. 99518

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