



UNITED STATES WOLF REFUGE

P.O. Box 2011 Chino Valley, AZ 86323 (520)636-9427

a national non-profit organization

dedicated to protecting and promoting the welfare of all wolves throughout North America
by providing education, information, refuge, and adoption services

DATE: February 25, 2000

FROM: William E. Chamberlain, Jr.
UNITED STATES WOLF REFUGE
P.O. Box 2011
Chino Valley, AZ 86323

TO: Dr. Albert P. Morgan
USDA / APHIS
Regulatory Analysis & Development
Suite 3C03
4700 River Road, Unit 118
Riverdale, MD 20737-1238

SUBJECT: Docket No. 99-040-1

Dr. Morgan,

The issue concerning the efficacy of the vaccines now approved for use in the species that was known as *Canis familiaris* when used in any of the species *Canis lupis*, has been an issue that we have been actively involved in for over ten years. We are well aware of all issues involved in this, both biologically and sociologically.

We have recently received all the comments submitted in reference to the above listed docket. There were 79 comments received within the comment period and 12 that were received late. We are assuming that you will consider all 91 of these equally. In summary, there were 85 (93.4%) comments that strongly supported the proposed rule. There was 1 (1.1%) comment that supported the proposed rule but with a stipulation. There was 1 (1.1%) that gave no support for or opposition to proposed rule, but suggested that if the proposed rule became a final rule that it be with a stipulation. There were only 4 (4.4%) that opposed it.

The supporting comments came from such credible and knowledgeable sources as the American Animal Hospital Assoc., 15 licensed veterinarians, 2 state veterinarians, 4 well-versed academic scientists, 2 lawyers, 10 wolf-related organizations, and even one of the vaccine manufacturers.

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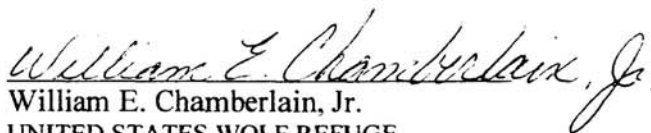
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The comments of opposition to the proposed rule are highly questionable. The response from Texas A&M University sites two objections. One is unrelated to proposed rule, and the other is based on misinformation. The response from Fairborn Animal Hospital feels that protecting the public from deadly diseases would be "inappropriate." The response from Surgical Sterilization Veterinary Consulting indicates that they feel these vaccines are ineffective when used on wolves and wolf-dogs, basing this contention on one isolated incident occurring almost seven years ago. I find it hard to believe the statements made the AVMA. They are alleging inadequate testing. There is more scientific evidence as to the efficacy of these vaccines when used on wolves and wolf-dogs than there is on domestic dogs. Secondly, there are several decades of widespread use of these vaccines on wolves at USDA sanctioned wildlife facilities. The sociological issue as to whether this would promote the keeping of wolves or wolf-dogs is unrelated to the scientific issue being proposed. The HSUS supports the proposed rule, but wants to add a stipulation to the approval language concerning the sociological aspect of breeding and keeping of wolf-dogs. Again, a sociological issue unrelated to the scientific issue of the proposed rule. Pfizer's statement that the efficacy of these vaccines has not been established by controlled safety and efficacy studies indicates that they choose to ignore the vast amounts of credible, scientific evidence derived from a significant number of controlled independent studies.

With this kind of scientific evidence and overwhelming support, you have no option but to approve the proposed rule as is, and to have it listed as a final rule as expeditiously as possible. The sociological concerns have no bearing on this. The four comments that opposed the proposed rule are based on inaccurate information, which skews their opinions and renders their comments invalid. I strongly urge you to enter the proposed rule as a Final Rule immediately. The public's health is at risk!

Sincerely,


William E. Chamberlain, Jr.
UNITED STATES WOLF REFUGE
Curator & Director of Operations

cc: Dr. Robert B. Miller