

The Wildlife Education and Research Foundation

501(C)(3) non-profit corporation

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*Dorothy Prendergast, Executive Director
Kenneth R. Podkonjak, DVM, Chairman*

November 6, 1999

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

Re: Docket No. 99-040-1

Gentlemen:

In response to your request for public comment, on behalf of The Wildlife Education and Research Foundation I submit the following.

The comments posted by USDA/APHIS in the Federal Register are a very concise but correct summary of events and data upon which the proposal is based. The Foundation has been involved in the effort to obtain official recognition for canine vaccine usage in wolves and wolfdogs for more than a decade and has never doubted their efficacy. It is true that we had many concerns about the use of live vaccines, as well as the use of modified live rabies vaccines in any canine and have always recommended using only killed rabies vaccines. We have never had any doubt about the safety and efficacy of any of the other currently existing canine vaccines in dogs, wolves or "dog-wolf crosses." The historical data provided supports this position.

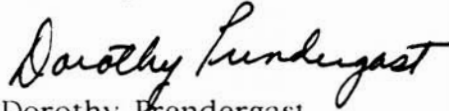
Over the years, several informal titer level studies of canine rabies vaccine effectiveness in wolves and wolfdogs have been conducted, both by this Foundation and by others which demonstrated a similar response in those animals to that demonstrated by *Canis familiaris*. Although the question was not specifically asked in those studies, there were no reports of adverse reactions or illness following vaccination.

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In an era when state public health agencies are seeking to halt rabies epidemics throughout the country by providing oral vaccines to wildlife, it would be foolish to ignore the large population of wolves and wolfdogs that are in such close proximity to humans. They need the same protection as other canines to stem the possibility of humans contracting the disease.

We fully support the proposed amendment to the Virus-Serum-Toxin Act.

Sincerely,

A handwritten signature in cursive script that reads "Dorothy Prendergast".

Dorothy Prendergast
(on behalf of
The Wildlife Education & Research Foundation)

DP:a