

Zoological Imports

8805 Dee Ellen Ln.

Riverview, FL. 33569 2336 '04 JAN 13 19:46

Tel. 813-240-1470

E-mail sands194@aol.com

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Division of Dockets Management (HFA-305)
Food & Drug Administration
5630 Fishers Lane, Rm. 1061
Rockville, MD. 20852

Subject: Economic Analysis & Monkeypox (2003N-0400)

To Whom It May Concern:

Please let me introduce myself. My name is Robert S. Sands Jr. I have been in the exotic animal business for twenty-four years. For the first seventeen years I was a major importer & exporter of reptiles and small mammals. After that I began specializing in three specific species to market. One of them was the prairie dog.

For you to be able to get a good picture of the prairie dog market you must first understand the market. The majority of the prairie dogs are not marketed over the Internet, as was used to determine your economic analysis. In fact I checked the web site you used, (exoticpets.com), on November 5, 2003. This site was updated on June 9, 2003, and according to the visitor's counter I was the first to visit the site since the update. This is definitely not a fair way to determine the prairie dog market, or how the monkeypox news affected the market. The fact is that I could sell all the animals I have in inventory right now. This could, in part, be because everyone in the industry knows that my animals were never in any contact with the infected animals, and are cared for properly and consistently. (My animals are never caged with any other species. There are no other animals in my prairie dog facility.) Of course it could also be because my business is in Florida, WHERE THERE WAS NEVER ONE (1) CASE of monkeypox virus confirmed.

The prairie dog market is like no other market. It consists of a close knit group of catchers and distributors. The catchers in Texas start collecting in March in south Texas and follow the babies north as they become weaned. The catchers have already got their buyers, (distributors), for the year, and the distributors also have their regular buyers set up for the year. The businesses that advertise on the Internet only move a small volume of prairie dogs. For example, I sell on an average of 3,000-3,500 prairie dogs throughout the year, and I don't advertise on the Internet.

Prairie dog sales represent 85% of my total annual income. I have a year round market for prairie dogs. I have a facility that holds up to 1,750 prairie dog pups at one time. Last year at this time last year I had 1,750 pups "in house" and I sold them all before the next season of baby prairie dogs. As you can see, prairie dogs do sell all year round!

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Your statement about nobody getting hurt in this action is very wrong. I, as a business owner, husband, and father, was hurt tremendously. Since June 11, 2003, I have had to refinance my home, sell my breeding stock of Sulcata tortoises (6.17, or a total of 23 animals) and six breeding pairs of Fennec foxes. The Sulcata tortoises are prohibited from being imported, so they are IRREPLACEABLE. I was forced to sell my breeders too quickly because my bills needed to be paid, which resulted in my having to accept less than the market value of these animals. The total sums of my losses due to the premature sale of my breeder stock, and refinancing my home, amount to \$37,100.00. This does NOT include the loss of future sales for all the babies that I will not have, or my costs for the care and maintenance of the prairie dogs in inventory.

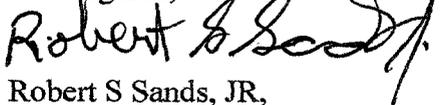
At this time I have 267 prairie dogs. It costs me \$600.00 a month to feed and clean these animals. This cost does not include rent or electricity. To date, my total monetary loss for the care and maintenance of the prairie dogs since June 11, 2003, is \$4,560.00. The monetary loss I will yet suffer if I am not allowed to sell the animals that I have had in inventory for over six (6) months totals \$20,025.00. This is based on the market price of \$75.00 each, which is what I charge per animal in the fall of the year.

If my math is correct, (and it is), this amounts to a grand total of \$61,685.00 PLUS in MY monetary losses alone, IN JUST ONE SEASON! This does not account for my future losses being literally infinite! Just think about THIS...I am only ONE (1) person in the industry! This might not be a huge loss to a multi-million dollar corporation, but to a small business owner this loss is devastating!

In view of all the above information I would like to be reimbursed for my losses, just as the government reimbursed the chicken businesses in California, (Newcastle Disease), and the bird importers when there was a problem with the birds after the quarantine period.

I will be looking foreword to a favorable answer within fifteen days of the receipt of this request.

Best regards,



Robert S Sands, JR,
Owner
Zoological Imports