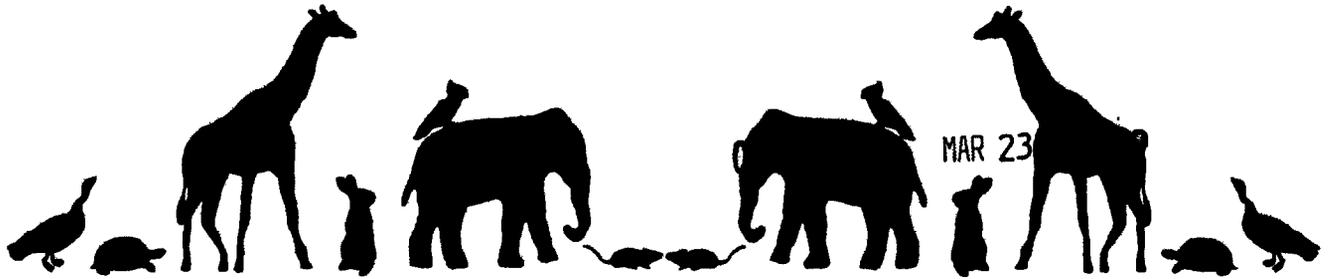


Exotic Pet & Bird Clinic



Thursday, March 17, 2005

ATTN: Dr. Crawford, Director, Food and Drug Administration
5630 Fishers Lane, Rm. 1061
Rockville, MD 20852

Congratulations or condolences on your confirmation as director. It is refreshing to see a veterinarian in a place of responsibility such as yours.

Re: Control of Communicable diseases: Restrictions on African Rodents, Prairie Dogs, and Certain Other Animals Federal Register: November 4, 2003 (Volume 68, Number 213) and OMB control number 0910-0519 (for 21 CFR 1240.63) and OMB control number 0920-0615 (for 42 CFR 71.56): As a private practice veterinarian and retired US Army Veterinary Officer I would like to pose a few questions and make a suggestion or two.

What other pet rodent and lagomorph species have been tested for vulnerability to Monkey Pox Virus? What steps have been taken to isolate those domestic pet species from imported African Rodents while in transport, holding, display etc. in the pet trade? Why not prohibit the keeping of Prairie Dogs (or anything else for that matter) in the same facility as African Rodents?

Prairie Dog owners are generally a harmless and law abiding lot, but emotional when it comes to their beloved pets. Without a legal and practical means of sharing these creatures with their peers, they will still share. Ask the State of California about pet ferrets under their prohibition during a decade or two.

The AVMA reports:

There are 379 current AVMA members who classify their species discipline as "exotic or wildlife animals." This represents approximately .5% of the AVMA membership. We do not have the numbers of Exotics only practices. (My clinic did \$7,560.40 in business with Privately owned pet Prairie Dogs alone in the year 2002. There are half a dozen clinics like mine in the local area.)

In the preamble paragraph III.E, 2nd column on page 62359, the Federal Register notice states, "If no further monkey pox cases are identified in the United States, and if there is no new information warranting an extension of the 6-month time period, FDA intends to revoke or amend 21 CFR 1240.63 as early as January 20, 2004, which will be 6 months after July 20, 2003." Revocation would eliminate the prohibition on capture, sale, barter, and interstate and intrastate transport and distribution of listed animals, including prairie dogs. (So when is 21 CFR 1240.63 to be lifted?)

Source: Mark Lutschaunig, VMD, MBA
Assistant Director, Governmental Relations Division
American Veterinary Medical Association
1101 Vermont Avenue NW
Washington, DC 20005-3521
(the comments in parentheses are mine wbn)

Sincerely,

W.. B. "Skip" Nelson, D.V.M.

ZooDVM@exopet.com

A handwritten signature in black ink that reads "Skip Nelson".

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2003N-0400

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