



Aviagen North America

Cummings Research Park
5015 Bradford Drive
Huntsville AL 35805
www.aviagen.com

tel 800 826 9685
tel 256 890 3800
fax 256 890 3919

Dr. Lester Crawford, Acting Director
Food and Drug Administration
5600 Fishers Lane, Rm. 1471
Mail Stop HF-1
Rockville, MD 20857

July 22, 2004

Dear Dr. Crawford:

I am writing you on behalf of the Association of Poultry Primary Breeder Veterinarians (see attached membership list) requesting a review of the ruling by the Administrative Law Judge (Judge Davidson) supporting the Center for Veterinary Medicine's request to withdraw the approval of Baytril for use in poultry. Members of our association represent companies that are responsible for the production of more than 80% of the world supply of meat-type chicken, egg-type chicken and turkey breeding stock. As veterinarians we are responsible for the health and welfare of the poultry in our charge, as well as issues related to food safety and public health. We have the additional responsibility of protecting and preserving our companies' irreplaceable breeding stock. Baytril has been, and continues to be the only consistently effective treatment for colibacillosis in poultry. For these reasons our members are extremely concerned about the potential loss of Baytril for use in poultry.

We follow strict rules for the use of any antimicrobial including fluoroquinolones (Baytril). We actively support and practice all initiatives recommended by the American Veterinary Medical Association and American Association of Poultry Pathologists relating to judicious use of antimicrobials to reduce the risk of resistance in food animals. We acknowledge that our compliance and cooperation are very important since we have very few options left to treat sporadic outbreaks of bacterial diseases in our valuable genetic stock. As suppliers of breeding stock to the U.S. and international poultry industries, and as veterinarians, we are committed to using our scientific knowledge and skills for the benefit of the public through the protection of animal health, the relief of animal suffering, and the conservation of livestock resources.

Based on the information presented during the Notice of Hearing (NOH) it appears that the risk to public health from continued prudent use of Baytril is minimal, and that in fact, contributes to a safer food supply. Clearly the issues are complex. We are convinced that a thorough and objective review of all evidence by a panel of scientific and legal experts to determine the true impact on food safety and public health with continued use of Baytril versus withdrawal of the product from the market is necessary.

Sincerely,

Eric L. Jensen, DVM, MAM, Dipl. ACPV
Aviagen North America
President, Association of Poultry Primary Breeder Veterinarians

Cc: Dockets Management Branch, Ref. Docket#00N-1571
Association of Poultry Primary Breeder Veterinarians membership



2000N-1571

C 283

**Association of Primary Poultry Breeder Veterinarians
June 2004**

Dr. Nicholas M. Dorko, Jr.
Aviagen Inc.
5015 Bradford Drive
Huntsville, AL 35805
P: 256-890-3841
F: 256-890-3919
E: n.dorko@aviagen.com

Dr. Phillip Eidson
Aviagen NA
5015 Bradford Drive
Huntsville, AL 35805
P: 256-890-3803
F: 256-890-3919
E: peidson@aviagen.com

Dr. Eric L. Jensen
Aviagen NA
5015 Bradford Drive
Huntsville, AL 35805
P: 256-890-3855
F: 256-890-3919
E: ejensen@aviagen.com

Dr. Carolyn Miller
Aviagen NA
189 Lantana Rd., Suite 101
Crossville, TN 38555
P: 931-484-3203
F: 931-484-4902
E: cmiller@aviagen.com

Dr. Gregorio Rosales
Aviagen NA
5015 Bradford Drive
Huntsville, AL 35805
P: 256-890-3813
F: 256-890-3919
E: grosales@aviagen.com

Dr. Bill Stanley
Aviagen NA
5015 Bradford Drive
Huntsville, AL 35805
P: 256-890-3800
F: 256-890-3919
E: bstanley@aviagen.com

Dr. Tahseen Aziz
BUTA
50 Seneca Trail
Lewisburg, WV 24901
P: 304-647-4312
F: 304-647-3038
E: tahseen.aziz@merial.com

Dr. Kate Barger
Cobb-Vantress, Inc.
5005 Roxbury Way
Springdale, AR 72762
P: 479-549-2841
F: 479-
E: bargerk@cobb-vantress.com

Dr. Scott Gustin
Cobb-Vantress, Inc.
P.O. Box 1030
Siloam Springs, AR 71761
P: 479-549-2846
F: 479-542-6772
E: gustins@cobb-vantress.com

Dr. Algis Martinez
Cobb-Vantress, Inc.
P.O. Box 1030
Siloam Springs, AR 72761
P: 479-549-2830
F: 479-524-6772
E: martinezal@cobb-vantress.com

**Association of Primary Poultry Breeder Veterinarians
June 2004**

Dr. Aldo Rossi
Cobb-Vantress, Inc.
P.O. Box 1030
Siloam Springs, AR 72761
P: 501-549-6043
F: 501-524-6652
E: rossia@cobb-vantress.com

Dr. Bob Owen
Hubbard
155 Landlock Drive
Statesville, NC 28625
P: 704-871-9623
F: 704-878-6513
E: robert.owen@merial.com

Dr. Bernie Beckman
Hy-Line International
2583 240th Street
P.O. Box 310
Dallas Center, IA 50063-0310
P: 515-992-4173
F: 515-992-3203
E: bbeckman@hyline.com

Dr. Douglas Grieve
Hy-Line International
2583 240th Street
P.O. Box 310
Dallas Center, IA 50063-0310
P: 515-992-4173
F: 515-992-3203
E: dgrieve@hyline.com

Dr. Kenton Kreager
Hy-Line International
2583 240th Street
P.O. Box 310
Dallas Center, IA 50063-0310
P: 515-992-4173
F: 515-992-3203
E: kkreager@hyline.com

Dr. G. Yan Ghazikhanian
Nicholas
P.O. Box Y
Sonoma, CA 95476
P: 707-938-1111
F: 707-935-0144
E: yghazikhanian@nicholas-turkey.com

Dr. Rick Sharpton
Perdue Farms, Inc.
3491 S. Evans St., Suite B
Greenville, NC 27834
P: 252-756-8437
F: 252-756-9428
E: alan.sharpton@perdue.com

Dr. Bruce Stewart-Brown
Perdue Farms, Inc.
P.O. Box 1537
Salisbury, MD 21801
P: 410-543-3783
F: 410-543-3742
E: bruce.stewart-brown@perdue.com