

STATE OF ALASKA

DEPT. OF HEALTH AND SOCIAL SERVICES
OFFICE OF THE COMMISSIONER

SEAN PARNELL, GOVERNOR

P.O. BOX 110601
JUNEAU, ALASKA 99811-0601
PHONE: (907) 465-3030
FAX: (907) 465-3068

March 30, 2010

Mr. George Utermohle, President
Grateful Dogs of Juneau, Inc.
PO Box 20887
Juneau, AK 99802

Dear Mr. Utermohle:

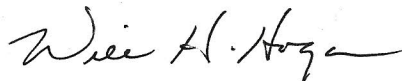
The department has received your petition for a regulation change under AS 44.62.220 and staff with the Division of Public Health, Section of Epidemiology have researched the impacts of your suggested edits to 7 AAC 27.022(a).

The proposed edits appear directed toward jurisdictions that require animal licensing (to include proof of rabies vaccinations) by local ordinance. However, formal animal control services and licensing of dogs exists only in a few discrete areas of the state. Dog owners in most rural areas are also without the services of a licensed veterinarian or overt enforcement of state rabies vaccination regulations. Your suggested edits would create a blanket expectation for exemption services and tracking by the Department of Health and Social Services, which is not currently feasible.

In addition, my staff has discussed the matter with several animal control officers in Juneau, Fairbanks and Palmer. None of these areas have an exemption in their city codes; however, some are currently willing to accept a letter from a veterinarian in order to waive the rabies vaccination requirement. It appears there is much inconsistency statewide on this issue and I believe it warrants more study as well as input from the Board of Veterinary Examiners.

At this time, the department does not intend to pursue a change to 7 AAC 27.022 and your petition is denied in accordance with AS 47.62.230. I appreciate you bringing this concern to our attention and will direct staff to continue to review the matter.

Sincerely,



William H. Hogan
Commissioner

cc: Board of Veterinary Examiners
Robert F. Gerlach, DVM, Department of Environmental Conservation