



**Grateful Dogs
of Juneau**

*Grateful Dogs of Juneau
P. O. Box 20887
Juneau, AK 99802*

March 22, 2010

The Honorable Bill Hogan
Commissioner
Department of Health and Social Services
P. O. Box 110601
Juneau, AK 99811-0601

RE: Petition for Adoption of Regulation Under AS 44.62.220:
Temporary Deferral of Rabies Vaccination Due to Medical Conditions

Dear Commissioner Hogan:

The Grateful Dogs of Juneau, Inc. is an Alaska nonprofit organization established to advocate on behalf of responsible dog owners and to promote responsible dog ownership.

Under AS 44.62.220, the Grateful Dogs of Juneau petitions for a regulation change to 7 AAC 27.022(a) to authorize a temporary deferral of the rabies vaccination requirement for a dog during periods of illness or medical treatment when, in the professional opinion of a veterinarian, a rabies vaccination is medically contraindicated.

Attached is a proposed regulation, including a form incorporated by reference, for your department's consideration. Your department has the authority to adopt the requested regulation under AS 18.05.010, AS 18.05.040, AS 18.15.355, AS 18.62.245, and AS 47.05.012.

We propose this regulation change because it will not adversely affect the public health. This proposal is consistent with the vaccine manufacturers' express instructions that the rabies vaccine is only for the "vaccination of healthy dogs". The rabies vaccination should be postponed or deferred during periods of serious illness when a rabies vaccination is medically contraindicated. For dogs that are so ill or under special medical treatment (like chemotherapy), the rabies vaccination could be a potentially life threatening procedure.

The proposed regulation is not so much about rabies control and prevention, as it is about local licensing of dogs. In municipalities with animal control powers, it is traditional practice to require licensing of dogs and, as a prerequisite for obtaining the license, the dog must have a current rabies vaccination and vaccination certificate. When a dog becomes seriously ill to the point that a rabies vaccination is medically contraindicated, dog owners will often not get their dog vaccinated. Current state rabies control regulations do not provide for a temporary deferral of the rabies vaccination requirement for medical reasons. Without a current vaccination or a deferral from the rabies requirement, these dogs cannot be licensed and thus are not licensed.

The purpose of the proposed regulation is to authorize a temporary deferral from the rabies vaccination requirement under the appropriate circumstances so that these dogs can be licensed by their local animal control agency. The significant public health and safety benefit of the proposed regulation is that local animal control agencies would be able to maintain records of unvaccinated dogs in their community. It is in the public interest for local governments to know about the presence and location of unvaccinated dogs in their community. The current rabies control regulations promote a situation where information about unvaccinated dogs does not exist because the dogs cannot be licensed.

In our research, we have found that several states allow exemptions or deferrals for medical reasons. These states include New Jersey, New Hampshire, New York, Pennsylvania, Connecticut, Colorado, and Oregon.

We recognize (and the proposed form states) that a temporary deferral of rabies vaccination does not exempt the dog from other rabies statutes and regulations. Thus, the safety of the public health is protected.

We would welcome the opportunity to discuss this petition with you or your staff. Our contact information is:

Grateful Dogs of Juneau
c/o George Utermohle
P. O. Box 20887
Juneau, AK 99802
(907) 586-3849
e-mail:norwaypt@gci.net

Thank for your consideration of this petition.

Sincerely,

George Utermohle
President
Grateful Dogs of Juneau, Inc.

cc: Director of Public Health
Alaska Department of Health and Social Services