***SAMPLE* Letter # 1**

Docket No. APHIS-2011-0009

Regulatory Analysis and Development, PPD, APHIS

Station 3-A-03.8

4700 River Road Unit 118

Riverdale, MD 20737-1238

RE: Docket No. APHIS-2011-0009: Horse Protection; Licensing of Designated Qualified Persons (DQP) and Other Amendments

 Thank you for the opportunity to comment on this important subject concerning the proposed amendment to the Horse Protection Act regulations that govern the inspection of horses at horse shows, exhibitions, sales and auctions. Let me be clear, I am fully committed to the proper care and treatment of my livestock, and I am appalled that anyone would use soring techniques as a training method with horses. I do not condone any such practice, and firmly believe anyone who participates in soring practices should be held accountable.

 However, I do not agree the proposed rule will accomplish that goal, and I strongly recommend USDA APHIS to withdraw this proposal because the broad and vague directions being proposed will go far beyond addressing the situation and impact, and possibly destroy, an entire industry. Soring must be stopped, but this proposed rule does not create a defendable, objective process that utilizes scientific means to identify cases of soring.

 For example, simply moving the inspection process to certify an individual that is a veterinarian or veterinary technician as a DQP does not necessarily mean that individual has the knowledge to enable them to objectively inspect a horse. Most of these individuals will be accustomed to working with small animals, and will be unaccustomed to working with large animals. This will create awkward situations that may actually “spook” the horse during the inspection process because the inspector is uncomfortable working with such a large animal. The inspectors need to be competent and knowledgeable individuals who regularly work with horses. Further, the current veterinarians or technicians being “trained” to do the inspections only receive about 40 hours of training. Do you really think this is adequate time to train someone how to handle and manipulate a large animal for inspection if they have been trained to deal with cats and dogs?

 This rule also does nothing to address the subjective nature of the inspections. The inspection should be based on sound scientific principles that will stand scrutiny as evidence if soring is found. Why not involve blood tests to expose the use of banned substances or X-Ray to actually check for the evidence of soring?

 Also, the proposed rule is vague in what breeds would be impacted, vague as to what training aids would be allowed or not allowed, and vague as to what foreign substances are being discussed. The rule seems pretty broad to include any gaited breed. Could that not include all breeds, and not just Tennessee Walking Horses, racking horses such as saddlebreds or trotters? Could it mean other species of livestock than just horses? Also, it should be noted that training aids or action devices do not necessarily result in soring. Some devices are proven to be therapeutic. The vague nature of this proposal could infer any training aid, on any species of livestock, could be broadly listed as causing pain or discomfort. Also, what are the foreign substances discussed in the proposed rule? It does not define what they are.

 Because this proposed rule is vague, because it would not result in objective inspections by competent, trained individuals, and especially because this could result in a far wider scope of enforcement than referenced in the proposal, I strongly urge this rule be completely withdrawn. This goes well past the Congressional intent of the Horse Protection Act.

Sincerely,