

*Leg-Animal*

November 20, 1974

Richard C. Riley, Ph.D.  
Director  
Division of Radiological Sciences  
University of Kansas Medical Center  
39th and Rainbow  
Kansas City, Kansas 66103

Dear Dr. Riley:

This will acknowledge receipt of the copy of your letter to the Animal and Plant Inspection Service, USDA, concerning the proposed regulation changes to the Animal Welfare Act.

Have previously indicated my interest in this matter to Dr. Chaloux, and will keep you informed of any meaningful exchange between our offices. As you know, the Department of Agriculture is receiving numerous comments which must be examined, and I believe that many questions must be answered completely before these regulations are implemented.

Appreciate knowing of your interest in this matter, and trust you will keep in touch.

Sincerely yours,

BOB DOLE  
United States Senate

BD:clj





THE UNIVERSITY OF KANSAS MEDICAL CENTER  
COLLEGE OF HEALTH SCIENCES AND HOSPITAL

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SCHOOL OF MEDICINE  
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UNIVERSITY HOSPITAL

DEPARTMENT OF  
DIAGNOSTIC RADIOLOGY  
ARCH W. TEMPLETON, M.D., CHAIRMAN  
(913) 831-6800

November 13, 1974

Deputy Administrator, Veterinary Services  
Animal and Plant Inspection Service  
U. S. Department of Agriculture  
Federal Center Building  
Hyattsville, Maryland 20782

Dear Sir:

I am writing to indicate concern with the USDA proposed changes in regulations governing the housing and care of animals used in research facilities appearing in the September 25, 1974, Federal Register, pages 34420-21.

While these proposed changes and regulations may be well intentioned, they represent, in my judgment, examples of imposed regulations without regard for proven need. While action in the absence of evidence may be a part of scientific inquiry, it is certainly foreign to the scientific method to declare that certain consequences of an action shall occur in the absence of evidence supporting that view. The major objections to the proposed regulation changes are:

1. Visual contact between dogs would create a situation which has long been recognized by veterinarians and investigators as potentially detrimental. Many dogs show aggressiveness from within the security of their own cages and an attempt to reach other animals sometimes leads to self-traumatization. Animals do not need to have audio-visual contact with one or more members of their own species.
2. Veterinary care for abnormal behaviour is adequately covered by present regulations. It appears to be added to the changes proposed as a "sugar coating" to make the other regulations more palatable to those without a deep understanding of the use and care of animals for scientific research.
3. The exercise requirement for dogs has no scientific validity. The disruption of routines on five of seven days is counter-productive for adaptation of animals' laboratory condition. In

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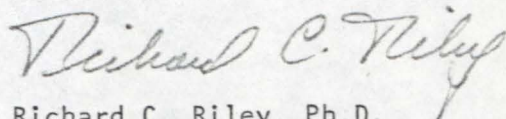
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To: Deputy Administrator  
Veterinary Services  
November 13, 1974  
Page two of two

addition, this regulation would markedly increase the costs associated with animal care without any significant or obvious benefit to the animals, experiments, or experimentors. This would be due largely to a required redesign of animal quarters, provision of special caging, and significant additional manpower.

The National Research Council appointed a committee to study these proposed changes in animal care regulations. They concluded, in part, that "if changes in regulations are not based on objective evidence of their validity, they may in fact result in a deterioration of animal care and the worsening of the very factors it was intended to improve". In my judgment, the caution of this committee of the National Research Council should be heeded. The proposed changes in regulations are indeed devoid of objective evidence of their validity and for that reason alone should not be enacted. Serious concern for any of the areas included in these proposed changes should be reflected by a commitment to research activity to provide a data base for formulation of a change in regulation.

Sincerely yours



Richard C. Riley, Ph.D.  
Associate Professor of Radiology  
and Radiation Biophysics  
Head  
Division of Radiological Sciences

RCR:fhg

cc: The Honorable James B. Pearson  
U. S. Senator  
4327 New Senate Office Building  
Washington, D. C. 20510

The Honorable Robert J. Dole  
U. S. Senator  
2327 New Senate Office Building  
Washington, D. C. 20510

The Honorable Larry Winn, Jr.  
U. S. Representative  
428 Cannon House Office Building  
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