



March 1, 2006

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Dr. Richard E. Hill, Jr.  
Director  
Center for Veterinary Biologics (CVB)  
United States Department of Agriculture  
Animal and Plant Health Inspection Service  
Veterinary Services  
510 S. 17<sup>th</sup> Street, Suite 104  
Ames, IA 50010

Re: Center for Veterinary Biologics Notice No. D011: True Name Change for Canine Vaccines with Bacterins Containing *Leptospira*

Dear Dr. Hill,

I am writing on behalf of the American Veterinary Medical Association (AVMA), established in 1863 and the largest veterinary medical association in the world. As a not-for-profit association established to advance the science and art of veterinary medicine, AVMA is the recognized national voice for the veterinary profession. The association's more than 72,000 members represent approximately 86% of U.S. veterinarians, all of whom are involved in myriad areas of veterinary medical practice including private, corporate, academic, industrial, governmental, military, and public health services.

Draft Notice No. D011 proposes that all licenses, Outlines of Production, and labels for canine products containing *Leptospira* serovars will bear a True Name identifying each *Leptospira* serovar in the product, no later than October 1, 2008. Heretofore, labels did not specify the serovar.

The AVMA agrees with the Center for Veterinary Biologics that a name that does not specify the serovar(s) is not sufficiently descriptive. It is important for veterinarians to be able to identify a product's leptospiral serovars in order to make customized, science-based vaccination recommendations to dog owners.

The AVMA supports this CVB proposal and encourages further proposals that add clinically relevant, science-based content to biologic product labels.

Cordially,

Bruce W. Little, DVM  
Executive Vice President

BWL/ECG