



September 5, 2006

Animal and Plant Health Inspection Service  
Regulatory Analysis and Development  
Station 3A-03.8  
4700 River Road, Unit 118  
Riverdale, MD 20737-1238

RE: Docket No. APHIS-2006-0012

The Coalition for Reuniting Pets and Families is, at its core, about restoring the confidence pet owners deserve to have when they microchip their pets – confidence that a well-functioning system is in place, and that the needs of pets and their families rather than commercial interests take precedence. We are not advocates for a particular company or one specific technology, but rather advocates for a microchipping and pet recovery system that assures lost pets will be reunited with their families.

In our October 10, 2005 letter to Dr. Chester Gipson, the Coalition urged USDA to solicit comments on the need for standards in companion animal microchipping. We applaud USDA for subsequently convening six informational meetings across the United States, through which stakeholders were able to communicate their views on this important issue. We also thank Dr. Gipson and his colleagues in the Animal Welfare Division for their thoughtful attention to the perspectives that were presented.

The Coalition believes an effective system for companion animal microchipping will facilitate APHIS in fulfilling its responsibility for animal health and welfare. Accordingly, the Coalition recommends that APHIS undertake the following four actions in order to create this effective system:

#### **Action 1 – Global Scanners**

The Coalition asks APHIS to draft rules that implement a mandatory global scanner system within the sector governed by the Animal Welfare Act. We also encourage APHIS to call on local and state governments to move in kind. We urge APHIS to include the following in its report to Congress:

- APHIS to require the use of global scanners within all places in its jurisdiction under Animal Welfare Act within three (3) years. The global scanners must be backward and forward compatible and read all 125 and 134.2 kHz microchips whether encrypted or unencrypted.
- APHIS to urge industry to provide global scanners on a practical, economical basis to all breeders, wholesalers, transportation firms and research facilities within the jurisdiction of APHIS ("APHIS jurisdiction entities").

- APHIS to prohibit encryption of microchips used by APHIS jurisdiction entities unless that encryption is compliant with requirements established by the International Standards Organization (ISO) and provides for readability of the microchip identification number by a global scanner.
- APHIS to encourage further development and use of walk-through scanners.

## **Action 2 – Microchipping Standards in the United States**

In a global community where animal movement is not contained by geographic boundaries, standards for companion animal microchipping make sense. We urge APHIS to endorse the need for standards governing chips, scanners and databases:

- APHIS to recognize that the only objective radio frequency identification (RFID) standards that have been developed to date are those established through the ISO process, that the ISO standards adopted in 1996 have been widely adopted by Western countries – including the American National Standards Institute (ANSI) in the United States – and that ISO standards have been adopted by APHIS for production animal, equine, and fish identification programs.
- APHIS to establish that effective in three years a comprehensive standard will be in effect for all microchipping activities and equipment within the jurisdiction of APHIS under the Animal Welfare Act. Further, APHIS will direct that the ISO-adopted standard will be the standard implemented unless an alternative standard is proposed to APHIS, reviewed and recommended as superior to ISO by a working group to be established by APHIS in such circumstances, and adopted by APHIS after recommendation by the working group.

## **Action 3 – National Registration and Database System**

We urge APHIS to form a task force to develop and demonstrate on a pilot basis a centralized pathway, available through both a Web-based search engine and a toll-free telephone call center, through which contact information for the appropriate pet microchipping registration database will be identified based on input of a microchip number. The task force should include representatives from the animal care and control community, the veterinary community, APHIS jurisdiction entities, and the microchipping industry. In its report to Congress, APHIS should address:

- The limitations of the current system and the need for an integrated registration and database system that is effective at the local level.
- How this integrated system would be available to agencies such as USDA and FEMA to facilitate recoveries during disaster response.
- The current components of registration and database systems that already exist in the United States and suggestions for improvement.
- Endorsement of a solution driven by animal health and welfare organizations and the microchipping industry, rather than a database and registration system managed by the federal government that potentially threatens privacy and proprietary interests.

- Identification of the industry and animal health and welfare groups willing to participate in the pilot.

#### **Action 4 – Stakeholder Education**

We urge APHIS to undertake an educational campaign that reaches stakeholders – animal care and control agencies, the veterinary community, APHIS jurisdiction entities, the microchipping industry, and the public – to create broad awareness of these new APHIS initiatives:

- APHIS to work closely with its jurisdiction entities during the transition.
- Messages include (1) the need for companion animal microchipping throughout the United States; (2) the benefits of a standards-based system; (3) the need for identifying companion animals with both collar tags and microchips; and (4) the responsibility for animal owners to register microchipped pets with a pet recovery database.

The result of these actions by APHIS will be to instill confidence in an integrated system based on objective RFID standards, which therefore has higher potential for successful outcomes in reuniting pets and families. The Coalition for Reuniting Pets and Families stands ready to consult with or assist APHIS in any way to achieve these goals.

Thank you for the opportunity to present these views.

Sincerely,

#### ***The Coalition for Reuniting Pets and Families***

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