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September 13, 2012

Federal Trade Commission
Office of the Secretary
Room H-113 (Annex X)
600 Pennsylvania Avenue, NW
Washington, DC 20580

Re: Pet Medications Workshop, Project NO. P12-1201

Dear Sir or Madam:

The Wisconsin Veterinary Medical Association (WVMA) is opposed to the proposed legislation H.R. 1406, Fairness to Pet Owners Act 2011. We recognize that pet owners should have the ability to obtain prescriptions for pet medications through their veterinarian. In fact, this process is already in place and being utilized by pet owners. Passing legislation for a process that already exists is burdensome and costly, both to the government and veterinary clinics (small businesses).

The WVMA advises all our members to follow the American Veterinary Medical Association's (AVMA) Principles of Veterinary Medical Ethics, that supports clients rights to choose where they want to have a prescription filled.

Veterinarians are the most highly trained individuals to provide the best professional guidance and education to pet owners when dispensing prescription products. They are trained on multiple companion animal species that consists of hundreds of breeds, and are educated to understand the multitude of doses, contraindications, drug interactions and side effects.

The average human pharmacist, unless they have had advanced training, does not have sufficient knowledge of species nuances to dispense and advise on animal medications safely or give adequate advice to pet owners. In fact, we have had several cases of pharmacists switching out medications, without veterinary consent, that have had detrimental health impacts on the animals.

If the goal is to protect pet owners and the animals they cherish, this is not the way to do it. In fact, passage of this legislation will put pets at risk and make owners vulnerable.

Sincerely,
Kim Brown Pokorny
Executive Director

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Integrity
Well-being
Community
Compassion