



September 5, 2005

VIA HAND DELIVERY

Chester A Gipson, DVM  
APHIS  
Station 3C71  
4700 River Road, Unit 118  
Riverdale, MD 20737-1238

Re: Petition for Publication of a Federal Register Notice Soliciting Comments on the Need for the Adoption of the ISO standard as the National Standard for the Microchipping of Companion Animals for Identification

Dear Dr. Gipson:

Pursuant to the Administrative Procedures Act, 5 U.S.C §553(e) and 7 C.F.R. §1.28, the Coalition for Reuniting Pets and Families (the "Coalition") hereby petitions the Animal and Plant Health Inspection Service ("APHIS") of the United States Department of Agriculture ("USDA") to publish a notice in the Federal Register soliciting comments ("Request for Comments") on the need for APHIS to promulgate regulations adopting the ISO standard as the National Standard for the microchipping of companion animals for identification ("National ID Standard").

**Background**

The Coalition, which is comprised of leading U.S. humane societies and veterinary organizations, is urging the U.S. to adopt a system that would allow all scanners to read all microchips. This is not a radical proposal: the U.S. has already adopted the ISO standard for the microchipping of wildlife and livestock. Language directing APHIS to develop such a regulation appears in House Report 109-102 (the "House Report") for the Fiscal Year 2006 Agriculture, Rural Development and Related Agencies Appropriations Bill (the "Appropriations Bill").

As you are aware, under the Animal Welfare Act ("AWA") (7 U.S.C. §2131 et seq.), the Secretary of Agriculture is authorized to promulgate standards and other requirements governing the humane handling, care, treatment, and transportation of certain animals by dealers, research facilities, exhibitors, operators of auction sales, carriers and intermediate handlers. The definition of animal in the AWA is, in part: any live or dead dog, cat, monkey (nonhuman primate mammal), guinea pig, hamster, rabbit, or such other warm-

blooded animal as the Secretary may determine is being used, or is intended for use, for research, testing, experimentation, or exhibition purposes, or as a pet. In exercising its responsibilities under AWA, APHIS has recognized the importance of identification of animals in the care or custody of individuals, groups or organizations under its jurisdiction.

The Coalition believes that the adoption of the ISO standard as the National ID Standard is important because the current U.S. system for microchipping of pets has not been shown to be an effective means of reuniting pets with their families. The failures of the current system and the need for a national standard have been underscored by the Hurricane Katrina disaster where thousands of companion animals have been separated from their families. Because many of these animals have not been microchipped, or have been chipped with inconsistent technologies, a large number of animals could be euthanized instead of being returned to their families. It is appropriate that APHIS address the issue of an effective and practical microchipping standard as it assesses the needs in the wake of Hurricane Katrina. It is possible to implement a system that will work successfully both in ordinary conditions and under the pressures of a regional disaster.

In an average year, eight to 10 million pets stray from home in the United States but less than 25% of lost pets are reunited with their family. Pet microchips could be a lifesaving solution and increase the number of pets reunited, but unfortunately, fewer than 5% of U.S. pets are microchipped. And, even for those pets that are microchipped, the system is ineffective because of problems with the scanning equipment, the lack of a centralized registry or database and the fact that pets are being fitted with chips of multiple frequencies. As a result, lost pets are euthanized because their owners cannot be located even when they have a microchip. Without a National ID Standard, a workable system may never exist and the number of pets in the United States currently implanted with a microchip for identification will not be expected to climb beyond its current, stagnant rate of less than 5 percent.

Microchipping of pets for identification has not been developed in the U.S. as successfully as it has in other countries because the U.S. has not implemented the worldwide-recognized open standard. Endorsed by the International Standards Organization ("ISO") and the American National Standards Institute ("ANSI") after a rigorous process examining all forms of microchipping technologies and practices, and used by nations around the world, ISO microchips feature "open" microchip technology where all scanners can read all chips and the chips have a better reading distance.

The implementation of the ISO standard for pets by most of the world – with the U.S. as the notable exception – has led to a global growth in animal identification. Countries that use the ISO standard, like Canada and members of the European Union, have significantly higher reunification rates – achieved at a much lower cost. For example, 47 percent of lost dogs find their way home in the United Kingdom, where ISO microchips

are used – some from the same companies that currently refuse to sell the ISO technology in the United States. Instead, these companies sell an older technology at a higher price to U.S. consumers and veterinarians.

Microchipping technologies have the potential to reunite millions of these lost pets with their families. But the technology must be universally applicable for it to see widespread adoption. In the United States today, a microchip made by one company can not be read by a scanner designed to read the microchip of another. A veterinary clinic may not have the right scanner to detect an identification microchip implanted in a pet by an animal shelter just down the street. Moreover, even when a chip is detected, a veterinarian's office or animal shelter may not have a registry of chipped animals to which it can quickly refer.

In a properly functioning, ISO based system, as the one used in much of the rest of the world, when a lost pet enters a shelter or veterinary hospital without collar tag identification, the microchip is a failsafe method of reuniting the pet with its family. The shelter or veterinarian waves one "global" microchip scanner, capable of reading all microchips, over the pet and detects the chip. The scanner then displays a microchip number and phone number of the database to where that microchip is registered. At that point, the shelter or veterinarian can call to find the pet owner's contact information.

It is important to note, the proposed change to ISO will not favor or harm any manufacturer because all manufacturers currently selling non-ISO technology in the United States manufacture and market ISO technology outside the United States. As things stand right now, pets that already have an unencrypted 125 kHz microchip can be read by an ISO scanner. Action by APHIS will not require pet owners to replace 125 kHz microchips. Pets will not die or be euthanized as a result of the adoption of the National ID Standard.

Furthermore, the Coalition firmly believes that the development of truly "global" scanners that can read all chips is a key component of the implementation of a National ID Standard. The language in the House Report clearly calls for the development of scanners that will read all microchips, no matter the frequency. The only potential problem with the adoption of the National ID Standard will be caused by certain manufacturers who have in the past sold encrypted "non-ISO" microchips and who could impede the development and distribution of a truly "global" scanner by refusing to either: (1) license the encryption technology or (2) sell "global" scanners utilizing the technology to the U.S. market. If this continues to happen, the development of a National ID Standard will still be both a necessary and important development for the welfare of companion animals, but the immediate benefit of the transition will not be as evident. In the short term, the animal welfare community will be forced to utilize at least two scanners (an ISO compatible scanner that can read both 125 and ISO chips and a non-ISO scanner that reads encrypted 125 kHz chips). The use of multiple scanners will increase the risk of error and decrease the number of pets ultimately reunited with their families.

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However, it is important to note, even if these manufacturers continue to refuse to aid in the development of a truly “global” scanner, the benefits of developing an ISO based National ID Standard that is compatible with the system used in the rest of the world and with large animals in the U.S. are still very real. In fact, the Coalition strongly believes that the proposed solution is a win for all: pet owners would enjoy greater peace of mind at a lower cost, and shelters, animal control officers and veterinarians would have a more efficient system to help pets be reunited with their families. In addition, for veterinarians who treat both pets and livestock, having one scanner would dramatically reduce the chance of errors.

The Coalition for Reuniting Pets and Families is, at its core, about 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 one 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. For the sake of pets and families across the country, we urge the USDA to take the first important step towards a National ID Standard and publish a notice in the Federal Register soliciting comments on the need for the adoption of the ISO standard as the National ID Standard.

Sincerely,

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

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