



April 16, 2007

The Honorable Mike Eng, Chair
California Assembly Committee on Business and Professions
State Capitol
PO Box 942849
Sacramento, CA 94249-0049

VIA FACSIMILE (916) 319-2149

Letter in opposition to AB 1634:

Attention: Tracy Rhine, Committee Consultant
Please place this letter on the Committee OPPOSE list for AB 1634

Dear Chairman Eng and Committee Members:

Canine Companions for Independence (CCI) strongly opposes Assembly Bill 1634, which would mandate the surgical sterilization of dogs and cats over four months of age. This legislation would have a devastating impact on the ability of CCI to continue operations and on the ability of Californians with disabilities to receive assistance dogs. As Chairman of the Board of Canine Companions for Independence, on behalf of CCI's more than 100 employees who are based in California and, especially, on behalf of the thousands of disabled Californians who have benefited or will benefit from partnership with a highly trained assistance dog, I urge you and your fellow Committee members to oppose this bill.

No exemptions for working dogs

While AB1634 states that an 'intact permit' may be obtained if it is shown that a dog is being trained or is working as an assistance dog (i.e., guide, service, or signal dog), this clause is nonsensical when applied to puppies that are four months old. CCI, like every other assistance dog organization, does not begin training dogs until they are over a year old. New breeders, those dogs selected to supply the next generation of assistance dogs, are not selected until they are close to two years old, so that sufficient health and behavioral data is available to ensure that the dogs selected represent the healthiest and soundest stock available. Surely, this scrutiny does far more to advance the health and well-being of dogs than attempting to make the decision regarding which dogs will breed and which will not when they are 16 week old puppies, which is what this bill would mandate.

In addition, AB1634 mandates that this 'intact permit' must be renewed annually in the owner's local jurisdiction. Even if local jurisdictions were to establish the mechanisms necessary for accomplishing this- which at the present time do not exist- the annual fee for each intact puppy and breeding animal would impose an undue, and possibly ruinous, burden on nonprofit agencies such as CCI.

Private breeders represent a valuable resource to working dog agencies

When CCI seeks to acquire outside dogs for our breeding program in order to prevent inbreeding and maintain genetic diversity, it is to small, private breeders whom we turn. These 'hobby' breeders produce healthy, sound animals because most of them are passionate about their avocation and invest the necessary time and care to breed the healthiest, highest quality dogs. Commercial, USDA licensed breeding operations, which can receive 'intact permits' under AB 1634, are much more likely to supply those dogs that are sold through pet stores and for laboratory testing. AB 1634 therefore eliminates the source of the healthiest dogs available within California.

Calling AB 1634 the 'California Healthy Pets Act' is a misnomer

Surgical sterilization of preadult dogs has been shown to increase the risk for several significant behavioral and health problems. CCI did a study on the effects of prepubertal gonadectomy (i.e., sterilization) in 1990, and found significant increases in failure rates due to both medical and behavioral reasons in those dogs that had been sterilized early. This research has been repeated elsewhere with the same results. Increased incidence of health problems such as urinary incontinence, osteosarcoma, hemangiosarcoma, obesity and orthopedic problems as well as behavioral problems such as environmental fear and interdog aggression are strong arguments against prepubertal sterilization for any dog, but especially those destined for a working role.

Canine Companions for Independence is a 501(c)3 nonprofit that works to bring greater independence to the lives of disabled men, women and children by providing them with highly trained assistance dogs. Founded in 1975, CCI has its national headquarters, breeding program and largest training center in Santa Rosa. In addition to our Santa Rosa campus, CCI has four other training centers nationwide, including one in Oceanside. Because of our history and two locations within California, more Californians have benefited from partnerships with CCI dogs than have the residents of any other state. Due to the extraordinary generosity of individuals throughout California and the United States, CCI is able to provide these dogs at absolutely no charge to the recipients.

While there are certainly other excellent reasons for opposing this bill, chief among them being that it would not achieve its stated goal of reducing the population in California's animal shelters, my chief concern is the ruinous effect this bill would have on the ability of Canine Companions for Independence and similar agencies to provide assistance and other working dogs to those who could benefit from them. Therefore, I urge you to oppose AB 1634 and look forward to your reply. Thank you very much.

Sincerely,

Ted Rogahn
Chairman of the Board of Directors