



September 27, 2010

1931 N. Meacham Rd.
Suite 100
Schaumburg, IL
60173-4360

phone 847.925.8070

800.248.2862

fax 847.925.1329

www.avma.org

Division of Dockets Management (HFA-305)
Food and Drug Administration
5630 Fishers Lane, rm. 1061
Rockville, MD 20852

**Re: Docket No. 2010-N-0368 - Agency Information Collection Activities;
Proposed Collection; Comment Request; Pet Event Tracking Network—
State, Federal Cooperation to Prevent Spread of Pet Food Related Diseases**

Dear Sir or Madam:

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, the AVMA is the recognized national voice for the veterinary profession. The association's more than 80,000 members comprise approximately 83% of U.S. veterinarians, who are involved in a myriad of areas of veterinary medical practice including private, corporate, academic, industrial, governmental, military, and public health services.

The Food and Drug Administration (FDA) is planning to implement an initiative called "The Pet Event Tracking Network" (PETNet) that will allow FDA and its State partners to quickly and effectively exchange information about outbreaks of illness in companion animals associated with pet food. When reporting a pet food incident, a PETNet member (state feed authority or FDA personnel) would fill out and submit a standardized electronic form on FDA's proprietary system, at which time the incident information will be available to other PETNet members.

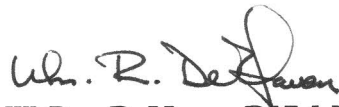
The AVMA appreciates the FDA's new PETNet system which will enhance real-time coordination between federal and state authorities regarding pet food incidents. The AVMA encourages continued development and strengthening of adverse event reporting systems, including continued collaboration with constituent professional organizations, industry organizations, government entities and other stakeholders.

While the AVMA recognizes that PETNet is designed for rapid communication of information, we also encourage the FDA to closely assess reported incidents as soon as possible, to ensure no confounding factors bias any determination of a need for a pet food recall. To assist in this effort, we encourage the FDA to incorporate drop-down menus for additional information within the PETNet reporting form; specifically, the presence of any pre-existing conditions. Other helpful information to collect includes 1) whether the adverse event was confirmed (versus suspected) to have been caused by pet food; 2) if the exposure was acute or chronic; and 3) the clinical outcome of the case.

We also ask that the FDA share relevant information with the AVMA in real time regarding potential pet food recalls, in order to facilitate information-sharing by the AVMA with our members and the public.

The AVMA welcomes the opportunity for continued dialog to further determine ways forward to promote rapid communication of adverse events. For further clarification on the AVMA's comments, please contact Dr. Lynne White-Shim at 800-248-2862 ext. 6784, or at lwhite@avma.org.

Respectfully,

A handwritten signature in black ink that reads "W. Ron DeHaven". The signature is written in a cursive style with a large, stylized initial "W".

W. Ron DeHaven, DVM, MBA
Executive Vice President and CEO

WRD/LAW