

RE: ODA proposed OAC Rule 901:1-6-05

To Whom It May Concern,

Please know I am hereby filing my fervid opposition to OAC Rule 901:1-6-05 for the following reasons:
The rule is vague on its face and in opposition to ORC Sec 956.031, hence it is illegal.

ORC Sec 956.031 mandates that all surgical and euthanasia procedures must be performed by a veterinarian.

OAC Rule 901:1-6-05 merely states a vet shall provide a written plan to include surgical instructions for breeders. This is entirely contrary to the intent of the legislature and a gross deviation from standard veterinary ethics and surgical procedures. Proposed OAC Rule 901:1-6-05 must be re-written to clearly state only licensed veterinarians can perform surgical procedures.

Sincerely,
Loren Loving-Vail, J.D.
529 E. Town Street
Columbus, OH 43215