

Veterinary Medical Board
2005 Evergreen Street Suite 2250
Sacramento, CA 95815-3831

Executive Officer Susan Geranen,

RE: Opposition to changes to Regulation 2037: "Dental Operation" defined

I am writing to voice my opinion about the attempts made by your Board to make anesthesia-free teeth cleaning (AFTC) illegal. I am appalled by your agency's repeated attempts over the years to deprive pet owner's in California the access to safe, affordable cosmetic teeth cleanings for their healthy animals that they actively seek. Below I have outlined the reasons for my opinion on this issue.

First of all, the messages coming from your office to consumers are quite contradictory. You have attempted over the years, unsuccessfully, to argue that simple removal of tartar and plaque from an animal's teeth is veterinary medicine, and hence, should only be done under the supervision of a veterinarian. However, other arguments by veterinarian experts, as stated even on your board's own web site, claim that AFTC does not adequately clean teeth (excludes "deep cleaning" underneath the gum line). Hence, it is argued, that AFTC does not prevent or cure disease (this is in fact a major argument against AFTC used by veterinarians who oppose it). This claim *directly reinforces* what AFTC informs ALL of it's customers, which is that the service provided does not replace regular veterinary check-ups and is a *cosmetic cleaning only*. So why have companies offering AFTC been harassed by your office, claiming that they are practicing veterinary medicine? This is a baffling question. Therefore, one can only assume that the VMB, your office, is only concerned with eliminating competition from the teeth cleaning marketplace and will use any attempt within your grasp to make such competition disappear, factual evidence and truth aside.

There has never been any legal backing to the claims made by your office that AFTC is illegal, despite your attempts to harass and slander AFTC locations into not offering such services any longer. Your web site offers information on a case against a company offering AFTC that sites a dicta opinion (no real legal standing). Furthermore, your bias against AFTC becomes quite clear when one researches the other cases in higher courts related to AFTC and discovers the findings support the *legality of AFTC every time!!* (see *Alexander v. State of California in San Joaquin Superior Court, Case # 205626*) If your office is fair-minded and only concerned with upholding the law, why isn't this case mentioned on your public web site? Again, therefore, one can only assume that the VMB, your office, is only concerned with eliminating competition from the teeth cleaning marketplace and will use any attempt within your grasp to make such competition disappear, factual evidence and truth aside.

I sincerely hope that your office will reconsider your aggressively biased opinion against AFTC and do what you were hired to do, enforce the law and attend to consumer complaints. Consumers, like me, want to continue to enjoy the benefits of AFTC, please do not take away our rights to enjoy such services.

Sincerely,

CC: DCA
Office of Administrative Law
Governor Jerry Brown