

December 28, 2010  
Re: OSC File No. DI-10-2335.

To Whom It May Concern:

I would like to express my thanks to the many people who were involved in the investigative process. It was readily apparent that the investigation was detailed and professional. I greatly appreciate all the effort that went into doing such a thorough job.

The central allegation I made is that any type of choke-off method is an abusive training technique. It was not stated in the actions taken that CBP accepts or refutes this statement.

There were supporting documents from other veterinarians as well as citing peer reviewed articles in the original statement stating that choking can lead to an increase in intra-ocular pressure as well as cause injuries to structures in the neck. The medical community has proven that harm can be caused by choking. I therefore feel that it is imperative that this method be removed from training. I did not see any evidence, other than anecdotal accounts, from the parties wishing to continue utilizing this technique proving it is a safe practice for the canine.

It has been stated that a cease and desist letter to stop teaching choke-off techniques has been sent to Director Larson. I also noted that a "5 and 7" technique is going to still be included in the training. A "5 and 7" is a choke-off technique and can still lead to physical and psychological damage to the dog. No medical professional stated that only certain types of choking methods were to be discontinued for the safety of the dogs.

According to the report, choking is still being utilized by Border Patrol handlers. This is supposed to be a unified training curriculum. Therefore I do not see how this technique is okay for one training center and not the other. The harm that has happened to canines at CCFR can occur to canines at CCEP.

I support the establishment of a Working group within the Executive Steering Committee. I feel that it needs to include a veterinary medical person in the group. I would also like to see personnel with a background in animal behavior be included to give expert opinions on training methodology. Hopefully this would eliminate any abusive techniques from being included in the training curriculum in the future.

Although it was not unanimous, the consensus of those interviewed at CCFR and elsewhere believes any choking technique to be abusive. The use of choke-off techniques was never used prior to the unified curriculum going into effect. Therefore in keeping with best practices eliminating all choking techniques is warranted.

Sincerely,  
Dr. Megan Keyes  
Veterinarian CCFR