

Congress of the United States
Washington, DC 20515

October 12, 2012

The Honorable Michelle M. Leonhart
Administrator
Drug Enforcement Administration
U.S. Department of Justice
8701 Morrissette Drive
Springfield, VA 22152


Dear Administrator Leonhart:

It has come to our attention that the Administration's interpretation of provisions within the Controlled Substances Act and resulting federal regulations make it illegal for registrants to transport controlled substances for use outside of a registered location.^[1] We are concerned with this interpretation because of its impact on the veterinary profession.

The practice of veterinary medicine is unique in that veterinarians treat multiple species of animals in different practice settings. Veterinarians' ability to practice medicine requires that they be able to provide mobile or ambulatory services. This is particularly important in rural areas and for the care of large animals because it is often not feasible, practical or possible for owners to bring livestock (i.e., cows, pigs, horses, sheep, and goats) to a bricks-and-mortar clinic or hospital. In addition, many companion animal veterinarians provide "house call" services for their patients or operate mobile veterinary clinics. In these instances, medications transported for use during procedures outside of the registered location are properly secured and recordkeeping maintained under Drug Enforcement Administration (DEA) requirements.

While we support the overall intentions of DEA's Diversion Control Program, we do not believe the intention of the program is to prohibit veterinarians from transporting drugs that are essential to provide complete veterinary care. This remains an issue of great concern to many of our constituents and, as such, we request your agency provide technical drafting assistance on how best to resolve this difficult situation to the satisfaction of both sides. We would like to schedule a meeting at your earliest convenience. Thank you for your consideration and we look forward to hearing from you.

Sincerely,


KURT SCHRADER FRANK LUCAS COLLIN PETERSON
Member of Congress Member of Congress Member of Congress

^[1] CFR 1301.12, "A separate registration is required for each principal place of business or professional practice at one general physical location where controlled substances are manufactured, distributed, imported, exported or dispensed by a person."



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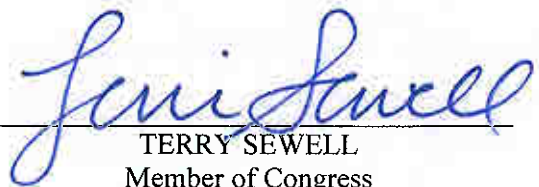
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