FSIS Docket Clerk, Docket #03-025IF, Room 102, th Cotton Annex, 300 12 and C Street, SW, Washington, DC 20250-3700. 34

Date January 14, 2004

From Hiroshi Saito

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Re: Comments on Docket No. 03-025 IF

Dear Sir.

I have a question about the definition of "downers", why it does not have any consideration on the age of cattle like SRMs?

As far as I read the dockets concerned, I can understand that the downers with less than 30months of age unlikely have risks of BSE in U.S.A.

- 1) Even under experimental situation, no abnormal prions were found from the cattle tissues under 32months old, except from the organs of distal ileum and tonsils.
- 2) The young cattle under 30months of age were rarely reported having had clinical symptoms including non-ambulatory.

In my understanding, non-ambulatory disabled could happen only after abnormal prions accumulated over certain amount in CNS, i.e. no clinical signs be seen until that time, even if the cattle already have abnormal prions in distal ileum and/or tonsil.

In the other part of docket also said that the study showed a significant higher finding of BSE infected cattle that were non-ambulatory disabled, however, I could not find the sentence which mention about the age of these non-ambulatory disabled.

If my understanding is correct, the signs of non-ambulatory disabled under 30monhts age does unlikely mean the effect of BSE, they must be regarded as being caused by the other reasons.

I believe that "before" making decision to be condemned, these cases must be carefully inspected by the veterinarians if the symptoms come from diseases or injuries.

Best regards,

Hiroshi Saito

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