North Carolina State University is a land-grant university and a constituent institution of The University of North Carolina

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Robbin Weyant
Centers for Disease Control and Prevention
Division of Select Agents and Toxins
1600 Clifton Road
MS A-46
Atlanta, GA 30333

Comments on the changes to the list of select agents and toxins.

Dear Robbin Weyant,

Having worked in BSL3 laboratories with various *Rickettsia* species for several decades, we have observed firsthand the growing infrastructure for oversight and regulation in the field of infectious diseases. As in all things, there have been both beneficial and detrimental impacts associated with increased governmental oversight of infectious disease research. We applaud the increased availability of standardized training at the BSL3-4 levels. However, we question the value of increased documentation of inventories and the need for annual inspections by federal representatives for those investigators working solely with *Rickettsia* species. On a frequent basis, these bacteria are detected routinely in various diagnostic laboratories throughout the world. Also, these bacteria are found readily in nature among ticks, fleas, and lice. Therefore, it is our contention that *Rickettsia* species could reasonably be removed from the list of select agents (*R.prowazeki* and *R.rickettsii* being named on the HHS list while *R.conori, R.akari, R.parkeri* and numerous other pathogenic *Rickettsia* sp. are not). From a bioterrorism perspective, mimicking transmission by these arthropod vectors in an effort to disperse these pathogens with intent to disrupt society would be challenging and technologically unlikely to be successful, as compared to other bacterial and viral pathogens currently on the select agent list.

While in some areas, the incidence and mortality rates associated with rickettsial infections can be high, common and readily available antibiotics are highly effective. In the context of protecting US citizens from rickettsial diseases, we believe that medical education of physicians, enhanced public education relative to ticks, and improved diagnostic practices are needed, rather than increased federal oversight for this genus of obligate intracellular bacteria.

Contagion is not a threat; as spread is determined by contact with the vectors, not through person to person contact. In our opinion, unfounded fears of bioterrorism should not be the basis for maintaining and funding the Select Agent Registry in the context of *Rickettsia* species. The potential misuse of these obligate, intracellular organisms, which currently requires fastidious attention to culture conditions and long term incubation periods to obtain minimally detectible levels of these organisms in cell culture systems seems highly unlikely. The limited federal and state budgets of today would be better used to support research than to regulate the efforts of scientists' attempting to improve upon the diagnosis, treatment and prevention of naturally-occurring rickettsial diseases.

Sincerely yours,

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