

September 6, 2016

Donna Pettry-Smith  
PO Box 1379  
New Lenox, IL 60451

Re: Comments regarding the "Horse Protection Act; Licensing of Designated Qualified Persons and other Amendments; Proposed Rule"

My name is Donna Pettry-Smith. I serve on the Board of Directors for the American Saddlebred Horse Association, American Saddlebred Registry, Illinois American Saddlebred Pleasure Horse Association, and USA Saddleseat World Cup. I am a member of the United Professional Horseman's Association, American Hackney Horse Society, and currently represent the American Saddlebred on the United States Equestrian Federation (USEF) National Breeds and Disciplines Council. I have been a USEF Licensed Judge for American Saddlebreds, Hackney Ponies, and Saddleseat Equitation since 2002. My husband, Kenny, and I currently own and operate Skyline Stables, an American Saddlebred training facility, in New Lenox, Illinois.

I would like to first say that I applaud the USDA and APHIS for their efforts in regards to making horse welfare a forefront concern, and in their efforts to end soring.

As a professional horse trainer, and third generation owner, breeder, and exhibitor of American Saddlebred horses and Hackney ponies, I can tell you that the foundation of our training program is to maintain sound, happy, healthy horses. In American Saddlebred competitions, soundness is a paramount requirement. An American Saddlebred show horse that is unsound is at a great disadvantage, so much so that a trainer or owner will scratch a horse from competition if it exhibits any sign of lameness, rather than showcase a horse that would be perceived as unsound.

It is my understanding that the main objective of the HPA is to eliminate soring in the breeds that gain a competitive advantage by being sore. In these instances, the HPA concludes that sored horses "compete unfairly with horses that are not sore", giving the sore horse a winning advantage. In American Saddlebred competitions, soreness will likely cause the entry to be last, not place, or risk judicial disqualification in any given class. The reason for this is because the American Saddlebred is a trotting breed of horse. In every class, in every division, our horses are judged at a trot. Even in the 5-Gaited division where our horses are judged at the rack, they are also judged at the trot. A sore horse simply cannot perform at the trot, is not competitive, and will not place well in American Saddlebred competition.

As a USEF Licensed American Saddlebred Judge, I am to uphold the strict guidelines and standards for equine welfare and soundness of competition horses set forth by the USEF Rulebook. The USEF Rulebook states in SB103.2 "All horses must be serviceably sound...Horses must not show signs of lameness." Additionally, the USEF Rulebook, in GR1033.7 and GR1204, addresses judges in regard to consulting with a veterinarian in order to disqualify an entry that they feel it is unsound. While the HPA relies on DQP's or HPI's to inspect horses for soring, our breed adheres to strict judging standards,

set forth by our breed organizations and the USEF Rulebook, that absolutely prohibit sore horses from achieving success in the competition arena.

Lastly, American Saddlebred horses are bred to be naturally high stepping and athletic. By applying the HPA regulations eliminating pads, wedges, and bands the proponents will be imposing unintended negative consequences upon a breed that does not abuse these tools. By eliminating these tools for trotting breeds, such as the American Saddlebreds, the proponents will be essentially creating a soundness problem. American Saddlebred farriers, veterinarians, and trainers use these tools for therapeutic purposes, comfort of the horse, and to add balance to the horse's natural way of moving, which in turn, prevents injuries. I am certain that the intent of the HPA is not to put forth regulations that would be detrimental to the health and soundness of any breed of horse.

If the proponents of the HPA are truly interested in equine welfare and anti-soring regulations, changes must be made to the regulations to protect the American Saddlebreds, and other trotting breeds, from the very thing proposed, by excluding them from being subject to the APHIS proposed rule changes.

The simplest, and most clear way to do so is to amend the language used in the HPA, most notably wherever the language "other related breeds" or "other breeds" is mentioned and change to read "other related **non-trotting** breeds" and "other **non-trotting** breeds". For example, in 11.10 (a) "At horse shows, horse exhibitions, or horse sales or auctions involving Tennessee Walking Horses, Racking Horses, and related breeds that perform at an accentuated gait that raises concerns..." Change to read to "At horse shows, horse exhibitions, or horse sales or auctions involving Tennessee Walking Horses, Racking Horses, and related **non-trotting** breeds that perform at an accentuated gait that raises concerns..."

Also language needs to be added in other areas such as 11.12(a)(1) Required Inspections parts (i), (ii), (iii), (iv), (v) and (3) to exclude trotting breeds of horses from being subject to these regulations.

The United Professional Horseman's Association would be happy to provide assistance to proponents in crafting language to amend the HPA to exclude trotting breeds of horses.