

From: [Tom Besser](#)
To: [Miller, Shannon D \(DEC\)](#)
Subject: Mycoplasma ovipneumoniae proposed regulation
Date: Thursday, October 29, 2020 10:42:55 PM

To whom it may concern,

I am a veterinarian who has worked at Washington State University and the Washington Animal Disease Diagnostic Laboratory where I have conducted research on infectious diseases of ungulates for nearly 40 years. During the last ten years, I have worked on the respiratory diseases caused by *Mycoplasma ovipneumoniae* in wild and in domestic sheep. This research has greatly clarified the central role *M. ovipneumoniae* plays in the severe respiratory disease outbreaks that have greatly limited the recovery of bighorn sheep populations. The bacterium has also caused similar disease outbreaks in thinhorn sheep, musk oxen, and mountain goats.

Based on this research background, I consider the transmission of new strains of *M. ovipneumoniae* into Alaskan wild sheep, mountain goat, and musk oxen populations a severe, possibly existential threat. *M. ovipneumoniae* exists in the form of hundreds of genetic strains that most commonly exist within domestic sheep and goat reservoirs. There is a large risk that pathogenic strains of *M. ovipneumoniae* will be introduced to Alaska with imported domestic sheep or goats, and I strongly support universal testing of such imports, using sensitive tests conducted by AAVLD accredited laboratories, in order to minimize this risk. While imported animals under two months of age may have a lower rate of *M. ovipneumoniae* infection or carriage compared to older animals, their risk is certainly not zero, and including animals imported while under two months of age will be an important part of any effective import testing program.

Another important aspect of reducing the risk *M. ovipneumoniae* poses to wild Alaskan sheep, mountain goats, and musk oxen, is to take serious measures to reduce the risk of transmission of strains of this bacterium already present in Alaskan domestic sheep and goats. These risks justify addition of *M. ovipneumoniae* to the reportable disease list with rapid reporting triggering effective Department of Agriculture interventions to reduce transmission risk.

Sincerely,

Thomas E. Besser DVM, PhD