AMERICAN KENNEL CLUB

Testimony of
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Before

U.S. House of Representatives
Committee on Oversight and Government Reform
Subcommittee on Intergovernmental Affairs

And

Committee on Homeland Security
Subcommittee on Transportation and Protective Security

On

"Innovations in Security: Examining the Use of Canines"

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Washington, DC

Introduction

Chairman Palmer and Chairman Katco; Ranking Member(s) Demming and Watson Coleman, and other distinguished guests.

It is a pleasure to be here in Washington today. On behalf of the American Kennel Club (AKC) I thank you for the opportunity to share some of our concerns and experiences with respect to the need, demand for and use of military working dogs, particularly explosives detection dogs, and ways that improving the domestic sourcing of detection dogs can help protect our national security.

Background/ AKC Mission

The American Kennel Club (AKC) was founded in 1884 by a group of sportsmen and dog enthusiasts who wished to record and preserve the bloodlines of their working dogs and advance their capabilities for future generations. Today, more than 130 years later, the AKC remains dedicated to protecting and advancing the unique capabilities of purpose-bred dogs as part of our mission of promoting the purebred dog and thoughtful breeding for type and function. The AKC is a not-for-profit organization and national club of more than 5,000 member and affiliated clubs around the country. In 2016, AKC and affiliated clubs sanctioned over 22,000 dog-related events throughout the country in disciplines ranging from traditional dog shows, hunting filed trials to dock diving. This year, AKC established a competitive scent detection sport.

We are also the largest all-breed registry in the world (and registered more than 1 million puppies in 2016). We are dedicated to advocating for the purebred dog as a working and family companion, advancing canine health and well-being; advancing the study, breeding and preservation purebred dogs; promoting responsible dog ownership; and working to protect the rights of all dog owners.

The AKC has a long history of helping the United States government with military working dog programs. During World War II, some 17,000 AKC registered dogs served in the Dogs for Defense program.

How AKC Got involved

In the last decade, AKC Board member Dr. Carmen Battaglia has been an advisor to the TSA Breeding Program at Lackland Air Force Base, providing expertise on breeding strategies and puppy raising protocols such as early neurological stimulation to improve long-term outcomes for successful military working dogs. Over the course of this interaction, AKC was asked how we might be able to help assist with development and procurement of quality, domestically-bred dogs suitable for training as military working dogs.

The AKC does not sell dogs nor do we seek to become a government contractor. We see our role as a facilitator who can provide expertise and information to our network of breeders, and bring them together with agencies that need very specific types of dogs that can succeed as military working dogs (MWD).

Military working dogs, including patrol and protection, explosive detection and others, play a visible and unprecedented role in our national security. According to various sources within and outside the government, 80% to 90% of the dogs purchased by Homeland Security and the Department of Defense are from foreign vendors or domestic vendors who import from foreign sources. It should be noted that the Transportation Security Administration partners with the Department of Defense to purchase a significant portion of their explosive detection dogs.

As Americans we should be concerned that an ever-growing percentage of the dogs that serve on the front lines of protecting the public, our public institutions and our national security are obtained from foreign, rather than domestic, sources.

There any many factors contribute to the development, deployment, and maintenance of a successful working dog. These include breeding expertise, sound animal husbandry practices, understanding and the ability to implement advances in research and knowledge of training, health, genetics, environmental influences, developmental factors, and other factors that contribute to creating and maintaining a successful working dog. The AKC brings to the table a breadth of knowledge, a large network of breeders, and the expertise and ability to facilitate among a range of stakeholders.

Approximately a year ago, the AKC formed a team to gather information about American use and procurement of explosives detection dogs, the challenges faced in having enough fully trained, deployable dogs to meet demand; and how changes in breeding and procurement might improve outcomes.

The team met with officials at the Department of Defense, the TSA, vendors, government and private contractors, academia, and law enforcement.

AKC heard a range of concerns regarding an over-reliance on foreign-bred and -procured dogs; lack of transparency and consistency in the selection process for untrained or "green" dogs; high failure rates among both foreign and domestic dogs; and procurement processes that could favor foreign dogs over domestically-bred dogs. We also heard that outcomes from scientific research and studies on improving performance and efficiency within our training programs were not being implemented consistently.

We were advised there was a need to bring together key stakeholders to improve communication and cooperation, bridge the disconnect between breeders and end users, expand knowledge, implement best practices and research findings, to share issues and expertise, and establish centralized center of excellence for the development of working dogs. The envisioned working dog center of excellence would be the venue to bring together key stakeholders to cooperate and share this information to advance how we develop and utilize explosives detection canines.

The US Detection Dog Conference

The AKC hosted the U.S. Detection Dog Conference on Feb. 28-March 1, 2017, in Raleigh, NC. AKC's inaugural conference assembled key stakeholders from government, academia and the private sector to discuss ways that AKC could help provide dogs to protect the safety and security of the United States and advance the concept of a working dog center of excellence. We plan to make this conference an annual event.

One view for a center of excellence included a 13-page proposal co–authored by Dr. Cindy Otto and Dr. Liz Hare of the Penn Vet Working Dog Center; Mr. Scott Thomas, formerly of the Department of Homeland Security; and Dr. Eldin Leighton of Canine Genetics Services, LLC; which was presented at the US Detection Dog Conference. The proposal offered guidelines for an independent effort that would bring together the private and public sectors in a working collaboration for the purpose of breeding purpose-bred, well-trained dogs to accomplish a variety of missions needed for the safety and security of the United States. Their paper offered data, recommendations and suggestions aimed at developing a plan that could be implemented in the future based on the knowledge gained from canine behavioral science.

Twelve presenters discussed issues surrounding the recognized shortage of domestically produced explosives detection dogs and a wide range of related issues, including. the use of dogs to mitigate the threat of terror; the DOD's supply logistics; canine genetics; semen collection & storage; the uses of DNA tests; breeding models; research; and organizational management. The conference was attended by more than 60 invitees, including U.S. Government staff; academic researchers; AKC delegates and staff; staff of North Carolina members of Congress; and private detection dog trainers. A synopsis of the speakers and Their presentations is appended.

Speakers included:

Dr. Carmen Battaglia of the American Kennel Club, LTC Mathew Enroth of the US Department of Defense Military Working Dog Veterinary Service (DoDDMWDVS);

Dr. Liz Hare of the University of Pennsylvania's Penn Vet Working Dog Center;

Dr. Eldin Leighton (Research geneticist (retired) for the Army SuperDog project and past president of the International Working Dog Breeding Association;

Paul Mundell, National Director for Canine Companions for Independence;

Sgt. Wendell Nope, K-9 Training Supervisor for the Utah Department of Public Safety;

Dr. Cindy Otto, University of Pennsylvania School of Veterinary Medicine and Executive Director of the Penn Vet Working Dog Center;

Donald Roberts, Program Manager for the Detection Canine and Surface Transportation Explosive Threat Detection Programs for the Homeland Security Advanced Research Projects Agency at the Department of Homeland Security (DHS);

Scott Thomas, Manager of the Transportation Security Administration Canine Breeding and Development Center.

Outcomes

At the conference, and through subsequent meetings with key stakeholders, a better picture of major issues emerged. These include:

U.S. Overreliance on Foreign Vendors is an Avoidable National Security Risk

Following the events of 9-11, the demand for scent detection dogs has steadily risen. More bombings in the U.S., Europe and elsewhere have accelerated interest. Around the world, demand for detection dogs is increasing, with many nations seeking dogs from the same European sources that the U.S. has relied on. Additionally, it's not only governments and militaries that are seeking dogs. Non-governmental demand around the world is also increasing, especially by private entities tasked with protecting malls, movie theaters, sports complexes, schools and any place large gatherings or high profile events take place.

Most U.S. government agencies are relying almost exclusively on the importation of working dogs from Europe to meet their needs. Most private working dog trainers and private providers of security services in the U.S. are also dependent on European sources.

The estimated 80% to 90% of the dogs purchased by Homeland Security and DOD from foreign sourced come from European nations (the Netherlands, Germany and Eastern European nations) with a strong history of breeding, training and trialing dogs in police/military style competitions and certifications, and an ability to produce these dogs in large kennels.

Labrador Retrievers are the breed of choice for most explosives detection work. Labs combine a strong work ethic derived from their innate drive to hunt all day for birds combined with a low reactivity level when working in close quarters for personal searches. They also exhibit a less intimidating profile than prick-eared breeds such as Belgian Malinois and German Shepherd Dogs, which excel at protection work.

The AKC registered more than 200,000 Labrador Retrievers in 2016. With so many Lab breeders in the United States, it's ironic that the Government travels to Europe to import "green" or untrained Labrador Retrievers for admission to U.S. detection dog training programs.

Quality Concerns

American experts in the importation and training of working dogs claim that for many years the U.S. has received less than the best picks of the of working dog candidates in Europe: The best dogs tend to be retained for use in Europe. Likewise, the U.S. must compete for dogs with countries able to offer large sums in direct cash transactions (rather than government credit cards or vouchers provided by the U.S.) There are also anecdotes of different federal departments and agencies finding themselves competing against each other in Europe for the same dogs. The growing threat of terrorism and consequent demand for working dogs within Europe and around

the world, means there is now a shortage of even mediocre quality foreign dogs available to protect the United States.

Consistent, Reliable Supply

Even if quality were assured, U.S. reliance on foreign sources of detection dogs could place national security in jeopardy if an interruption in sourcing occurs due to a natural disaster or geopolitical event. A pandemic of canine disease in Europe or zoonotic disease could also easily impact this supply of dogs.

We have the knowledge, the breeding stock and breeders. It only makes sense to protect our national interests by ensuring a quality domestic supply of detection dogs.

Buy American/Train American

Current law (10 U.S.C. §2302) states a preference for purchasing dogs from U.S. breeders; however there is a disconnect between the government and breeders or vendors in understanding the requirements or standards that define an acceptable green dog, and in creating the structure to supply a steady source of dogs capable of meeting government requirements. Transparency in requirements and a cost comparison of the full cost per dog of using domestically-bred versus foreign-bred dogs should be investigated and implemented. Qualified domestically-bred dogs should have at least the same opportunity as foreign sourced dogs to become part of U.S. canine detection teams.

Some Working Dog Needs/Status (2017)

Currently, there are an estimated 10,000 working dogs in the United States, including dogs working in government, military, law enforcement, and private facilities. About 20 percent of working dogs retire each year. Working dogs typically go to work at 18 months to 2 years of age and have an average working life of five years before retirement.

The Department of Defense operates a small breeding program, primarily for Belgian Malinois, at its kennels at Lackland Air Force Base in San Antonio, TX, but the program cannot meet the total need so the DOD purchases most of its dogs in Europe.

The Transportation Security Administration (TSA) had a detection dog breeding program from 2002-2012 primarily for Labrador Retrievers, until it was closed down in 2012 due to budget cuts. When the TSA breeding program was disbanded the result was that it placed an even greater reliance on the sourcing of military working dogs from overseas sources.

With 1,000 teams deployed, TSA has a 20% attrition rate, plus a stated need for at least 100 new teams this year, so they would be seeking 321 new dogs ready to deploy before 2018.

The Customs and Border Patrol also has requested 325 additional dogs.

Overview of Evaluation for Acceptance in US MWD Program

The government evaluates untrained ("green") dogs at about 1 year of age to consider them for purchase and entry into the detection training program. The dogs must pass a stringent health examination, including hip, elbow and lumbar radiographs, and then undergo a multi-step evaluation for the following key traits:

- Sociability – Dogs must be sociable enough to be easily handled by people and to be at ease around people of all types (men, women, children), but should not be so sociable that they are distracted by the presence of people; continually pulling to see people; jumping on people, etc.
- Environmental Stability – Dogs must not show fear or nervousness around loud and/or strange noises; they must show physical rigor whether working in very hot or cold temperatures; and they must be bold and willing to walk on strange surfaces/open steps/moving surfaces like conveyor belts, etc., when working.
- Desire to Obtain Reward – The dog's drive to obtain its reward is the key to the dog working. Detection dogs are trained on toys, such as Kongs or tennis balls NS must have a very strong drive for that toy. Food is not used as it is difficult for handlers to carry, and there is too much food in the environment that could confuse the dog (airport terminals have numerous food vendors; passengers carry food with them on planes.)
- Hunting Ability – The dogs must show intense drive to keep hunting all day without getting frustrated and without giving false alerts.

Government Purchase Practices

The DOD and TSA purchase dogs from vendors who are pre-approved to sell to the government. Vendors may obtain a government contract and, after showing that they provide a high percentage of dogs that meet the standards, might be awarded a Blanket Purchase Agreement (BPA). The government places orders with BPA vendors who then must be able to fulfill the order within 30 to 60 days. The government might call with a request for 10 dogs, and the vendor then is expected to produce at least double that number as not every dog will pass the standards examination and be purchased. In recent months, we understand that DOD has relaxed some of these contracting requirements.

AKC Outreach to breeders and vendors over the last year has indicated that domestic breeder and vendors would generally be interested in providing dogs to the government for use as detection dogs, but several factors discourage them from doing so.

Government Contracting Requirements Are Challenging for Small Breeders

Many small volume breeders, on their own, do not produce sufficient numbers of dogs to engage in the cumbersome government contracting process. Some breeders indicated a willingness to

sell (or even donate) a high-quality puppy but are were held back by a lack of knowledge or ability to negotiate the transfer and complicated government contracting and payment processes.

The Economics of Domestic Puppy Rearing

Typical breeders of the types of dogs sought by the MWD programs come from sporting/field trial lines where a high-quality puppy may be sold at 8-12 weeks of age at a price comparable to what is offered by the government for a puppy of 9-12 months of age. (The federal government does not generally purchase dogs until they are 9-12 months of age and old enough to enter training programs.) The older age at which the government wants a puppy is problematic for breeders. Many kennels do not have not have facilities to maintain quantities of puppies for an additional 6 months or longer, especially with no guarantee of purchase at a later date. If breeders hold a puppy for an extra 6-9 months, and it is not accepted into a MWD training program, the puppy will then be past the ideal age for placement as a hunting dog, field trial prospect or pet. Furthermore, undertaking the necessary age-appropriate socialization and training for a future MWD during this time represents additional significant costs over and above costs incurred if the puppy had been sold at 8-12 weeks of age.

Sources inside and outside the government have stated that the DOD and TSA indicate that they are paying less for dogs purchased in Europe than from the U.S. vendors. However, with reports of increasing issues with dogs sourced from overseas, it is unclear what the actual cost differential between the two sets of dogs may be.

Likewise, some U.S. vendors are procuring puppies from Europe and bringing them back to the U.S. to socialize and sell to the Government. Vendors who do this are also having a hard time finding enough dogs to dogs to fulfill their contracts or make a profit.

Comparison of Costs Between Domestic and Foreign Dogs Should Take into Account the Additional Costs Associated with Obtaining Dogs Overseas

The Government has stated that untrained dogs purchased outside the continental U.S. are less expensive than those purchased in the U.S. However, this does not include per capita adjusted costs related to the additional expense associated with importing dogs, including: travel for the procurement team; shipping the dogs; costs of conducting health screenings and training overseas and additional screenings upon return to the US; and all expenses associated with those that fail to become deployable MWD. Language was included in the recently passed House National Defense Authorization bill that requires a detailed report on the cost of MWDs. AKC encourages the House of Representatives to insist this language be included in the final conference report.

Concerns about Transparency on Evaluations/Subjective Interpretations of Scope of Work

Vendors, breeders and government employees have expressed concerns about vague standards and inconsistent interpretations of requirements in published scopes of work for green dogs. They note this is particularly problematic for "subjective" portions of a dog's evaluation, where evaluators may have significant leeway in judging factors such as environmental stability, sociability or drive/hunting ability. Such inconsistency creates frustration and confusion about standards sought for dogs entering MWD programs. AKC repeatedly heard complaints about the use of tools for testing environmental stability that breeders/vendors felt were not relevant to or reflective of actual scenarios a dog would encounter when deployed. One vendor expressed concern about a lack of transparency and substantive feedback by evaluators when dogs had been rejected with little explanation. It would be beneficial to all parties for breeders, trainers and vendors to know how to better prepare dogs for their evaluations. Above all, the needs and performance standards by which dogs are selected should be clear, consistent and readily available to dog breeders, vendors and trainers.

Contracting Challenges

Several domestic vendors have stated that they are shifting their business model away from selling dogs to the government, and instead toward obtaining private security contracts where they provide explosives detection services with their own dogs as part of a larger suite of services. The shift in business models may address some vendors' frustrations with selling dogs, but as these vendors begin to hold onto more of their own dogs, it will further reduce the pool of qualified dogs for government purchase.

Vendors cited the reason for their changing business practices as the inability to cover their costs in selling dogs to the government. Challenges contributing to this included set asides for small business in the Federal Government contracting process. Several vendors stated that to provide the number and quality of specialized dogs needed to fulfill a contract, they had to expand to a point where they could no longer qualify as a small business. The current purchase code for MWDs is "live animals" (NAICS 112990/ PSC 8820) which has a lower threshold for definition as small business than codes for other key military or national security resources. The AKC hopes that the Federal Government will consider creating a separate NAICS code for national security-related working dogs.

Scientific Approaches Can Reduce Subjectivity, Improve Outcomes

The use of scientific research goes beyond the physical capabilities of what makes a good working dog. Advances in the science of canine behavior (cognition, bio-chemistry, genetics, neuropsychology, etc.) associated with canine behavior should also be incorporated into improving selection and development of working dogs.

Thank you for your time and interest in our findings. I am happy to answer any questions you have and I would also be willing to follow up on any questions you may have in the future.

<center>**Addendum**</center>

<center>**AKC Hosts US Detection Dog Conference**</center>

AKC hosted the U.S. Detection Dog Conference on Feb. 28-March 1, 2017, in Durham, NC, bringing together key figures in government, academics and the private sector. The conference was extremely well received, and attendees expressed appreciation for AKC in taking this step to address this issue.

Twelve presenters provided excellent talks on the reasons for the shortage and a wide range of related issues, including the use of dogs to mitigate the threat of terror, the DOD's supply logistics, canine genetics, semen collection & storage, and the uses of DNA tests, breeding models, research, and organizational management. The conference was attended by more than 60 invitees, including US Government staff; academic researchers; AKC delegates and staff; NC congressional staff members; and private detection dog trainers.

Dr. Carmen Battaglia opened the event with a welcome and opening remarks on the purpose of the conference and why AKC was involved. AKC Board Vice Chairman Carl Ashby presented an introduction to AKC and our core values, mission and purpose

Presentations included:

Sgt. Wendell Nope of the Utah Department of Public Safety serves as the K-9 Training Supervisor for more than 3,000 officers and dogs. He provided the audience with an overview of the dangers present in our cities and the need for well-trained detection dogs. He reported that in his survey of 10 states, 80 to 90% of the police dogs were imports.

Lt. Colonel Mathew Enroth, Chief of Veterinary Diagnostics at the US Department of Defense Military Working Dog Veterinary Service, Lackland Air Force Base, discussed the screening and evaluation of dogs being considered for purchase by the United States. He shared information about the government's buying trips to Eastern Europe and the issues of procurement. The primary reasons for failure of the medical requirements are included poor hips, elbows, lumbar and temperament. Other reasons include heart murmurs, heart worms, and poor body condition. He discussed the difficulties related to attracting families for puppy raising, global changes in purchasing, and the competition for working dogs with other countries who need them for their own protection.

Scott Thomas, program specialist for the TSA canine and breeding program, Lackland Air Force Base, ran the successful TSA breeding program until it ended due to budget cuts in 2012. He titled his presentation "lessons learned," which included information about selection in a breeding program and success in the field. Thomas primarily bred Labradors at the TSA kennel. He said his best breeding candidates were dogs with working lines whose pedigrees reflected success in hunting and field trials. He discussed the importance of environmental factors and socialization during the raising of the litter and how this could impact the dogs' success rate as a detection dog. He discussed the TSA evaluation criteria for "green" dogs (dogs that have not received formal detection training).

Dr. Eldin Leighton is president of the International Working Dog Breeding Association. He retired from the breeding program at The Seeing Eye and as a research geneticist in the US Army

Super dog project. He presented a 13-page proposal co–authored by Dr. Cindy Otto, Dr. Liz Hare and Scott Thomas. The paper offered a number of guidelines for an independent effort that would bring together the private and public sectors in a working collaboration for the purpose of breeding purpose-bred, well-trained dogs to accomplish a variety of missions needed for the safety and security of the United States. Their paper offered data, recommendations and suggestions aimed at developing a plan that could be implemented in the future based on the knowledge gained from canine behavioral science.

Dr. Cindy Otto, Executive Director of the U. Penn Working Dog Center, began her presentation with an informative video that depicted the on-going work at her center and how it achieves its success with students and the community. Her video showed the training and development methods used with puppies and their progress toward working in a detection field, including cancer and epilepsy detection. Research at the Center focuses on the uniqueness of the canine olfactory system and on tests designed to evaluate detecting unique substances.

Otto expanded why the United States needs a national breeding program with features that include a national semen bank, phenotype screening and studies to evaluate both the successful dogs and those that fail.

Dr. Liz Hare, a quantitative geneticist at the U. Penn Working Dog Center, presented her statistical research and data on phenotypes, genotypes, pedigrees, heritability and estimated breeding values (EBV). Her talk included issues related to breedings using EBV, based on specified criteria, together with accurate pedigree information, and how that could be used to improve the selection for complex traits.

Paul Mundell, executive director Canine Companions for Independence, spoke about Assistance Dogs International's North American Breeding Cooperative and how that has helped schools have a better source for service dogs. The cooperative was formed in 2013 to address problems encountered by small breeding programs. Participating service dog training schools pay an annual fee of $1,500. Potential breeding dogs are donated by participating programs, purchased from outside breeders, or acquired through cooperative deals with nonparticipating programs. The program is made possible because all dog transportation costs are subsidized through in-kind donation from American Airlines.

Paul Bunker is the chief trainer for K2 Solutions, a government vendor based in North Carolina. Bunker and his team from K2 used an outdoor area to demonstrate the abilities of dogs trained to find and detect dangerous substances and follow a person through a crowd that is carrying suspicious substances. He explained how they buy young dogs from breeders and train them to sell to the government or private entities.

Don Roberts is Program Manager for the Detection Canine and Surface Transportation Explosive Threat Detection Program for US Department of Homeland Security Advanced Research. He discussed on-going research targeted at improving the operational proficiency of canine detection teams. His presentation included methods that test and evaluate protocols used in homemade explosives, support for state and local law enforcement agencies, and ways to improve operational effectiveness.

A panel discussion made up of Dr. Carmen Battaglia, Dr. Cindy Otto, Dr. Paul Waggoner of Auburn University, Scott Thomas, and Paul Bunker completed the day and addressed topics that centered on a national center for excellence, research measures, data collection, semen storage and usage, breeding protocols, costs and the pricing of puppies in the program.   Dr. Battaglia summarized the proceedings with a brief overview of the conference and challenged the audience to review the discussions, recommendations and suggestions.