



April 27, 2010

Dr. Rowan Gould
Acting Director
U.S. Fish and Wildlife Service
Department of the Interior
1849 C Street, NW
Washington, DC 20240

RE: Proposed Listing of 9 Species of Constrictor Snakes as Injurious
Docket No. FWS-R9-FHC-2008-0015

Dear Dr. Rowan:

The Pet Industry Joint Advisory Council (PIJAC) submits herein a request for a 90-day extension of time for submission of public comments in response to the proposed listing of nine species of constrictor snakes as injurious under the Lacey Act.

The grant of a 90-day extension will not result in irreparable harm and will provide for far greater informed public responses. The initial 60-day period does not provide sufficient time for respondents to analyze not only the 22 -page Federal register Notice, but also key underlying documents relied upon by the Service. These include an 8-page "Initial regulatory Flexibility Analysis for Listing;" a 56-page "Draft Economic Analysis;" a 47-page "Draft Environmental Assessment;" and the 302-page USGS "Large Constrictor Risk Assessment." The current time frame is insufficient for businesses and the general public alike to respond to a rather complex and lengthy proposal.

PIJAC is a national trade association representing all segments of the pet industry: importers/exporters, breeders, wholesale distributors, product manufacturers, retail outlets, and affiliated hobby organizations, and individual hobbyists and pet owners. Our members serve the 62% of the U.S. Households that care for and maintain a wide variety of animals, including the species proposed for listing under the Lacey Act. Thank you for considering our request and please do not hesitate to contact PIJAC if you have any questions.

Respectfully submitted,
Pet Industry Joint Advisory Council

By /s/ Marshall Meyers
Marshall Meyers, CEO

**PET INDUSTRY JOINT
ADVISORY COUNCIL**

1220 19th Street, N.W., Suite 400
Washington, DC 20036
Tel: 202-452-1525
Fax: 202-293-4377

CHAIRMAN

James Heim
Central Garden & Pet, Walnut Creek, CA

FIRST VICE-CHAIRMAN

Frank Koch
Natural Balance Pet Foods, Pacoima, CA

SECOND VICE-CHAIRMAN

Jim Seidewand
Pet World, Inc., Rochester, NY

SECRETARY/TREASURER

Cedric Danby
PFX Pet Supply, West Sacramento, CA

DIRECTORS

Bill Brant
The Gourmet Rodent, Jonesville, FL

Bruce Cook
Classic Products LLC, Elwood, IN

Cedric Danby
PFX Pet Supply, West Sacramento, CA

Ruth Jeffers
Jeffers Pet, Dothan, AL

Roger E. Lambert
Lambriar Inc., Mahaska, KS

Bob Merar
General Pet Supply, Milwaukee, WI

Sandra Moore
Segrest Farms, Gibsonton, FL

Joe O'Leary
PetSmart, Inc., Phoenix, AZ

Michael Peterson
The Pet Group, Carlsbad, CA

Mark Pustizzi
NEMA, Inc., Hollis, NH

Gerry Tomas
Tomas Sales & Marketing, Homer Glen, IL

Marcie Whichard
PETCO Animal Supplies Inc., San Diego, CA

ASSOCIATION REPRESENTATIVES

Ruth Jeffers (WPA)
Jeffers Pet, Dothan, AL

W. Paul Norton (FTFFA)
Norton's Fisheries, Ruskin, FL

PAST CHAIRMEN

Irving Gall
Paramus, NJ

Neill J. Hines
Federal Way, WA

Timothy A. Hovanec, PhD
Moorpark, CA

Allan Levey
Secaucus, NJ

Joel Martin
Arlington, VA

Alexandre G. Perrinelle
Los Angeles, CA

Elywn Segrest
Gibsonton, FL

CHIEF EXECUTIVE OFFICER

Marshall Meyers

