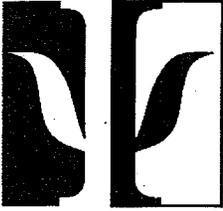


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PENNSYLVANIA PSYCHOLOGICAL ASSOCIATION

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August 24, 2012

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Gregory P. Sirb
Executive Director
State Athletic Commission
2601 North 3rd Street
Harrisburg, PA 17110

Dear Mr. Sirb:

I am responding on behalf of the Pennsylvania Psychological Association to the proposed regulation published in the July 28th *Pennsylvania Bulletin* which would allow the State Athletic Commission the option to waive, under certain conditions, the prohibition on striking the head while on the ground ("pound and ground") for amateur athlete mixed martial arts competition.

We believe that this decision needs to be informed by the recent medical literature on the very severe and sometimes permanent damage that could occur as a result of a single severe blow or numerous repeated blows to the head. The neurological evidence for head trauma is increasing as evidence comes from studies of soldiers returning from military combat or athletes involved in contact sports.

Specifically permitting blows to the head increases the danger of chronic traumatic encephalopathy (CTE) that may occur in the absence of loss of consciousness or a concussion. According to a recent article published in the *Journal of Neuropathology and Experimental Neurology*, "the symptoms of CTE are insidious," meaning that the initial symptoms may be subtle and hard to identify as related to brain injury. Eventually the symptoms become more severe and include disorientation, confusion, mood changes, depression (including suicidal thoughts) and an increased the risk of early dementia.

Data suggests that CTE is more prevalent than once believed and it is no longer confined to boxers. A recent survey of retired NFL players showed a 19-fold increase in memory-related disorders, such as Alzheimer's, in the 35 to 49 age group and a 5-fold increase in ages 50 or older, when compared to national standards.

Consequently, we do not support the change that would permit a waiver of the "striking to the head while on the ground" provision. We have no position on the other proposed regulation change dealing with the shin/instep pad requirement.

Sincerely,

Thomas H. DeWall, CAE
Executive Director