



# VOM LÖWENHERZIG

January 2, 2007

**Bureau of Dog Law Enforcement  
Attn: Ms. Mary Bender  
Pennsylvania Department of Agriculture  
2301 North Cameron Street  
Harrisburg, PA 17110-9408**

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 INDEPENDENT REGULATORY  
 REVIEW COMMISSION

Dear Ms. Bender:

My name is Samantha Canuso of Vom Löwenherzig Rottweilers. I am a small caring and conscientious Code of Ethics breeder of Rottweilers located in Douglassville, PA. I have been involved with the Rottweiler breed for over 20 years and am a member of the United States Rottweiler Club, American Rottweiler Verein, the Allegmeiner Deutscher Rottweiler Klub in Germany and the founder of the Southeastern PA Rottweiler Klub. Our dogs are carefully selected and bred for stable temperaments and excellent character. Our personal dogs and the dogs we produce are home raised and socialized in a sanitary, loving and nurturing structured environment. Our dogs receive the best diet; veterinary care and training that could be asked for. But most of all they are a loving and essential part of our family on a daily basis.

In addition to our high standards of physical and medical care, we require AKC registration, USRC registration, AKC and CHIC DNA on all the dogs we own or produce. In addition, any dog that leaves our premises is microchipped and tattooed for identification purposes should the dogs ever be lost. As conscientious breeders that also care about the welfare of the dogs we produce, we also take back any of the dogs we have bred at any time during their lives should the owner not be able to keep the animal for any reason. We also require AKC Canine Good Citizen certifications on all of our dogs and the dogs we produce. We carefully screen and select potential homes and deeply care about the dogs we own, the dogs we produce and the people that own our dogs.

I am writing to comment on the proposed amendments to the Pennsylvania dog law regulations issued on December 16, 2006. I emphatically support the efforts to improve inhumane and substandard kennel conditions, but I do not agree that most of the proposed regulatory changes would have a beneficial outcome if passed. I strongly feel that many of these proposals are simply not practical. For the most part some of these proposals appear excessively burdensome to the already (and in most cases simply non-existent) overburdened state animal control resources, excessively costly to enforce or outright unenforceable. In general while I feel strongly that measures need to be taken, in general I don't feel these proposals will improve the quality of life for the poor dogs in these kennels.

**Examples of problems with the proposal are the following:**

- \* The definition of "temporary housing" would require thousands of small residential hobby and show breeding households, such as myself, to become licensed. The costs associated with compliance of these regulations in comparison to the very limited number of dogs we breed per year would be staggering and simply impractical.
- \* The obligations of owners of "temporary housing" which are made subject to inspection by the proposal are not enumerated or limited.
- \* There is no scientific or accepted husbandry basis for the amended space and exercise requirements.

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\* Smaller breeders and dog owners, such as myself, who maintain their dogs in their own residential premises but are covered by the Pennsylvania dog law, **who provide care and conditions far superior to those required by the proposed new standards**, would be unable to comply with the rigid commercial kennel standards. We are NOT commercial kennels and should not be treated as such. We provide a far better standard of care and socialization and training than ANY commercial breeder of dogs could ever hope to provide.

\* The record keeping requirements with respect to exercise, cleaning, and other aspects of kennel management are excessively burdensome and serve no useful purpose, as it would be impossible to verify their accuracy. Such circumstances already violate existing regulations, which are not currently being enforced.

\* The proposals pertaining to housing and social interaction of dogs of different sizes are contrary to good husbandry, socialization and training practices.

The above is far from a complete list of the deficiencies with the proposed regulations. In effect it appears that the proposed regulations will serve no more purpose than to effectively eliminate the small Code of Ethic breeders who are dedicated to the dogs they produce and to providing extremely high levels of care and socialization for those dogs and the people who they home those dogs with.

I also associate myself with the more detailed comments on this proposal by the Pennsylvania Federation of Dog Clubs.

The Bureau has conceded that its current regulations to stop the inhumane treatment of dogs in commercial facilities have not been adequately enforced due to lack of time, monetary issues and personnel. The current proposal appears to be merely a laundry list of ideas for improving the environment for dogs that has no connection to specific instances in which the welfare of dogs could not be secured, and no basis in science or accepted canine husbandry practices. I urge that this proposal be withdrawn.

Respectfully,

Samantha Canuso  
Vom Löwenherzig Rottweilers  
Douglassville, PA