

2559

RECEIVED
DOG LAW ENFORCEMENT

RECEIVED

JAN 3 2007

2007 JAN -6 AM 10: 24

Bureau of Dog Law Enforcement

Attn: Ms. Mary Bender

Pennsylvania Department of Agriculture

2301 North Cameron Street Harrisburg, PA 17110-9408

INDEPENDENT REGULATORY
REVIEW COMMISSION



Dear Ms. Bender:

I am the president of our local dog club. I am writing to comment on the proposed amendments to the Pennsylvania dog law regulations issued on December 16, 2006.

I believe that inhumane and substandard kennel conditions should not be tolerated, but I do not agree that most of the proposed regulatory changes are needed, or would necessarily have a beneficial outcome if adopted. Many are impractical, excessively burdensome and costly, unenforceable, and/or will not improve the quality of life for the dogs in these kennels.

I have also bred my Australian Shepherd and personally had four dogs in my home at one time and all were trained to perform in Obedience Competition.

The definition of "temporary housing" would require thousands of small residential hobby and show breeding households to become licensed which could not possibly comply with the regulations, and which there is no reason to regulate. I personally only deal with the hobby and show breeding households when looking for a new puppy. This would certainly limit my prospects of finding a quality, show potential pup, by curtailing their breeding ability to comply with this bill.

Smaller breeders and dog owners 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.

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. I also associate myself with the more detailed comments on this proposal by the Pennsylvania Federation of Dog Clubs. The Bureau has tacitly conceded that its current regulations have not been adequately enforced.

If, after implementing its recently announced enhanced enforcement program, the Bureau finds it is still unable to prevent inhumane treatment of dogs because of specific deficiencies in the existing regulations, it should cite these specific deficiencies and propose changes based on them. 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.

Sincerely yours,

Andrea M. Malloy
Andrea M. Malloy

President

Lower Bucks Dog Training Club

PH: 215 943-8380

176 Forsythia Dr. S.

Levittown, Pa. 19056