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

2007 JAN 11 AM 10:13 01/03/2007

INDEPENDENT REGULATORY
REVIEW COMMISSION

Dear Ms. Bender:

My name is William Schnarrenberger, I reside at 1174 Freedom Rd. Cranberry Twp., Pa.. I show, breed and I am a licensed Judge for the AKC. I have held many offices in breed clubs over the years and founded The Japanese Chin Club of Western Pennsylvania. While I applaud what I believe is your intent, you are in essence throwing the baby out with the bath water. I believe, if these proposed changes are made, many quality breeders will fall by the wayside. This I believe would be a detrimental effect to your cause.

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.

With that being said, I would like to pose a few questions, your answers should shed some light on the negative affects that will occur from just some of the measures you are proposing.

- 1. Is it better that puppy's are born and raised in a kennel atmosphere versus in my living room where they are monitored and socialized all day and night?**
- 2. How is a 20 minute walk on a lead, make for stronger, healthier dogs than ones that run and play in my yard many times during the day?**
- 3. How is it legal to say my dogs can not play or exercise on the grass, when the buyer is allowed?**
- 4. Is it better that my dogs have the run of the house where they are part of the family or confined? Have you ever saw a dog do donuts or circles while running, from being confined in a strict kennel situation?**
- 5. If you where coming to buy a puppy, would you rather buy one that has been loved and cared for in a home environment or walk into a kennel building that a pup has never left, to pick out the new addition to your family?**
- 6. If you take the show and hobby breeders out of the equation, that in most cases have spent many years striving to produce the healthiest and closest to the standard of the breeds, are you not in reality cheating those people that want a sound and healthy pure bred dog?**

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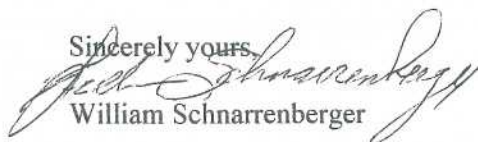
Examples of problems with the proposal are the following:

- * The definition of "temporary housing" would require thousands of small residential hobby and show breeding households to become licensed which could not possibly comply with the regulations, and which there is no reason to regulate.
- * 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.
- * The regulations will require wholesale renovation, if not rebuilding, of many kennels already built in compliance with current federal and/or state standards. There is no scientific foundation for the arbitrary, rigid engineering standards specified.
- * 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 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 in all but the most egregious circumstances. Such egregious circumstances already violate existing regulations.
- * 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,

William Schnarrenberger