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DOG LAW ENFORCEMENT

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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

INDEPENDENT REGULATORY
REVIEW COMMISSION



Dear Ms. Bender:

My name is Scott Wilson and I am an ACTIVE registered voter and resident in the state of PA. I own 4 dogs and see many problems with the proposed regulations to be introduced. I think these regulations should be directed to the puppy mills and not at small private breeder who only has a litter every 2 or 3 years. My dogs are pets who sleep in my house and are taken care of better then most children are. It is so unfair to lump all dog owners under these strict rules. My views are the same as listed below. I will be following thses concerns closely and will be sending this same letter to congressman, representatives and all dog owners I know.

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.

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. **(I am not a puppy mill, this regulation is unfair to me)**
- * The obligations of owners of "temporary housing" which are made subject to inspection by the proposal are not enumerated or limited. **(I own my home and am not a comercial facilty, so my privacy should not be violated, because I raise dogs for my own pets)**
- * There is no scientific or accepted husbandry basis for the amended space and exercise requirements. **(Who or what gives the rights of inspection of how I excersize my dogs, I run them every day)**
- * 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. **(My outdoor kennels are to the standards of my township, not you unbasised standards)**
- * 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. **(I am not a commercial kennel, so this generalization is wrong and unfair)**
- * 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. (Do you really expect small pet owners like me to keep records of my pets?)

* The proposals pertaining to housing and social interaction of dogs of different sizes are contrary to good husbandry, socialization and training practices. (Totally wrong when applied to private dog owners)

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,

Scott Wilson
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Upper Black Eddy
Pa, 18972