

2559

JODY BRINLEY

**320 Woodland Avenue
New Cumberland, PA 17070-1880**

January 5, 2007

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

INDEPENDENT REGULATORY
RENEW COMMISSION

2007 JAN 18 AM 10:56

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Dear Ms. Bender:

I am a Pennsylvania resident residing in New Cumberland, Cumberland County. I have been a dog lover and owner almost my entire life and in the last seven years have become quite involved in exhibiting in all aspects of the sport of dogs – conformation, agility, earthdog, rally obedience and tracking. I also am an AKC licensed earthdog judge. For the last eleven and a half years I have owned and exhibited West Highland White Terriers, and have recently been involved in breeding Westies. It is because of my love for and involvement with dogs that I write this letter 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.

The definition of "temporary housing" would require thousands of small residential hobby and show breeding households to become licensed. There is no reason to regulate this, and it would be almost impossible to enforce.

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 would be covered by this new Pennsylvania dog law. Many already provide care and conditions far superior to those required by the proposed new standards, but would be unable to comply with the rigid commercial kennel standards.

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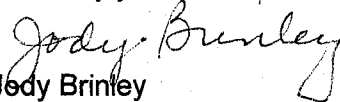
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The proposals pertaining to housing and social interaction of dogs of different sizes are contrary to good husbandry, socialization and training practices.

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,


Jody Brinley

Cc: Hon. Jerry Nailor
Senator Pat Vance
Pa. Federation of Dog Clubs