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January 7, 2007

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

RECEIVED
2007 JAN 18 AM 10:54
INDEPENDENT REGULATORY
REVIEW COMMISSION

Dear Ms. Bender:

My name is Janelle M. Ploskina. I live at 10901 Sophia Court, North Huntingdon, PA 15642. I have been involved with dogs for many years. I am a very small hobby/show breeder who is a current member of my national breed club. I also do canine rescue on a small scale. With my involvement with the Papillon Club of America, I must follow a code of ethics. I take these ethics very serious and take every opportunity to educate any individual I have contact with the importance of spay/neuter, proper maintenance and diet, importance of routine veterinarian care, etc. I am subjected to inspections from American Kennel Club at any time, which I welcome at any time.

My main reason for writing this letter is 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 of these proposals are impractical, excessively burdensome and costly, unenforceable and/or will not improve the quality of life for the dogs in these kennels. I realize Pennsylvania has a problem with puppy mills, but these proposals will not resolve that problem.

Examples of problems with the proposal are the following:

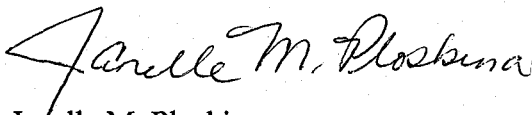
- The definition of "temporary Housing" would require thousands of small residential hobby and show breeding households to become licensed which could not possibly comply with the regulations, and which there is no reason to regulate.
- The obligations of owners of "temporary housing" which are made 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 federal and/or state standards. There is not 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 managements 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 am a small residential hobby and show breeder. In 2006, I had produced one litter that consisted of 2 puppies. The proposals are too excessive to be of any help for what they are being proposed to alleviate.

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 and propose changes 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 this proposal be withdrawn.

Sincerely,



Janelle M. Ploskina
10901 Sophia Court
North Huntingdon, PA 15642

CC: James Casorio
Robert Regola
Pennsylvania Federation of Dog Clubs