

January 8, 2007

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INDEPENDENT REGULATORY  
REVIEW COMMISSION

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

Dear Ms. Bender:

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.

Dogs have been a major part of my life for over 35 years. I have worked with rescue, health issues, training and only very limited breeding. My dogs have always been a part of my life and home and I do acknowledge that they live better than many people do. I feel that people need to regulate the indiscriminate breeding and poor kennel conditions that exist in many areas but like many things, "one size does not fit everyone".

\*Temporary Housing: many of excellent breeders only produce one, sometimes two, litters a year and this takes place in their own home. These dogs are and puppies are part of the family, properly socialized and in very comfortable surroundings. How are you going to require that they become licensed? These breeders offer far better care and conditions than outlined but would never be able to comply with the rigid commercial kennel standards.

\*Why are the obligations of owners of "temporary housing" which are made subject to inspection not enumerated or limited? This doesn't give the owner an idea of what is or is not permitted and gives inspectors and open door to proceed as they wish.

\*What is the scientific or accepted husbandry basis for the amended space and exercise requirements? I am unable to find something that fits this.

The above is far from a complete list of the deficiencies with the proposed regulations. I also associated 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.

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DOG LAW ENFORCEMENT

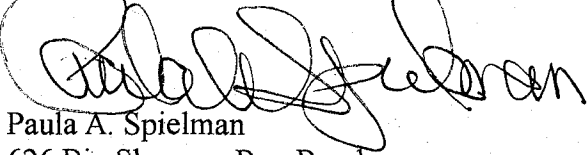
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As with anything, we can so over-regulate that there is no way to follow-through on inspections or enforcement but the laws can be used as vendettas which serve no useful purpose. Better to put the effort at closing puppy mills that are turning out massive numbers of litters a year without proper socialization, no follow-up on conditions and little concern on the health and background of the dogs they are using to breed.

I am not against legislation but I would like to see some more research done before any laws are passed and would hope that we can get away from "one size fits all" so that we can do the best possible job for these wonderful, loyal animals.

Thank you for your consideration.

A handwritten signature in black ink, appearing to read "Paula A. Spielman". The signature is fluid and cursive, with a large initial "P" and "S".

Paula A. Spielman  
626 Big Shannon Run Road  
Mount Morris, PA 15349