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PO Box 248
Swarthmore PA 19081

January 10, 2006

Ms. Mary Bender
Pennsylvania Department of Agriculture
2301 North Cameron Street
Harrisburg, PA 17110-9408

Re: Doc No. 06-2452

Dear Ms. Bender,

The proposed "puppy mill" law is going in the right direction but it needs to be modified slightly in order not to impose an undue burden upon small-time breeders and dog-showers who are not running puppy mills. The law really needs something more refined than a *cumulative annual threshold* so it can be better targeted to the undesirable conditions of "puppy mills". The proposed law would apply to

...any establishment that keeps, harbors, boards, shelters, sells, gives away or in any way transfers a cumulative total of 26 or more dogs of any age in any 1 calendar year...

Some breeders raise puppies expressly to be family pets, and so raise them in their homes in order to socialize them and get them used to household noises, and some might also show their own dogs and dogs owned by others a few times a year, or put a few studs out to sire. The law needs to have some language added that exempts those small-time concerns from onerous regulations. I suggest that the law apply to **"any establishment that keeps, harbors, boards, or shelters more than twelve (12) puppies or six (6) adult dogs on premises at any one time."** I picked the number 12 only because it is large enough to accommodate the breeds that give birth to large litters.

Or what if a breeder puts two sires out to stud? If each stud were bred to one female per month, that would be cumulatively 26 registered animals on site for the year, but never more than 4 on premises at any one time. Why subject that breeder to onerous regulations because of a *cumulative annual threshold*? This small number of dogs would be living in family quarters or in other safe and adequate housing. Existing regulations adequately protect the health and safety of these dogs.

I hope you can adopt language along the lines of what I have suggested here, to better target the regulations. Thanks for your consideration.

Regards

Tim Romano

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