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1/10/2007

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

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2007 JAN 19 AM 9:32
INDEPENDENT REGULATORY
COMMISSION

Dear Ms. Bender:

I am a Pennsylvania resident of 34 years and have bred, raised and shown to their championships many Briards (French sheppards). My dogs are known for their outstanding conformation and temperaments and they are all **home-raised. The latter is especially important in our breed.** I am also an NCA judge and past secretary of the Briard Club or America.

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, and will not improve the quality of life for the dogs in these circumstances. For example:

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.

Smaller breeders and dog owners, as myself, 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 also associate myself with the more detailed comments on this proposal by the Pennsylvania Federation of Dog Clubs.

The Bureau has 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 The current proposal is not justified and I urge that it be withdrawn.

Sincerely,

Dr. M. Lana Sheer

CC: Gov. E.G. Rendell, Sen. D.F. Pileggi, Rep. S. Barrar

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1/12/07

