

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

1/12/07

Re. Doc. No. 06-2452

Dear Ms. Bender:

My name is Carol J Metz, and I reside at HCR 61 Box 27, Allensville, PA. I have bred, owned and shown in various venues, Shetland Sheepdogs since 1988, and have had a class 1 kennel license from that time until the present. I am writing to comment on the proposed amendments to the Pennsylvania dog law regulations issued on December 16, 2006. Although I believe in the humane treatment of dogs, I find these proposed changes impractical, excessively burdensome and costly, difficult to enforce and not likely to improve the quality of life for the dogs, especially those falling in the class 1 category.

Examples of problems with the proposal are the following:

- 1) Smaller breeders and dog owners, such 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.
- 2) The definition of "temporary housing" would require thousands of small residential show and hobby breeding households to become licensed, which could not possibly comply with the regulations and which there is no reason to regulate.
- 3) The record keeping requirements with respect to exercise, cleaning and other aspects of kennel management are excessively burdensome and serve no useful purpose, as it would be impossible to verify their accuracy.
- 4) The proposals pertaining to housing and social interaction of dogs of different sizes and sexes are contrary to good husbandry, socialization and training practices.
- 5) This proposal-supposedly aimed at improving the welfare of dogs in larger breeding facilities, may well make it impossible for the smaller breeders, who strive to breed for the health, and betterment of a breed, to continue to do so. This will force the consumer, who is seeking a healthy, well-bred and well-socialized companion, to seek their companion from a kennel where there is no regard for quality, or testing done for genetic problems.

The above list 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. This proposal, as written, appears to be nothing more than a laundry list of ideas for improving the environment for dogs that has no basis in science or accepted canine husbandry practices. I urge that this proposal be withdrawn.

Sincerely,

*Carol J Metz*

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