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**Susan C. Owens
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Berwyn, PA 19312**

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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INDEPENDENT REGULATORY
REVIEW COMMISSION

January 14, 2007

Dear Ms. Bender,

We are writing to express our distress at the proposed amendments to the Pennsylvania dog law regulations issued on December 16, 2006. We are avid dog owners and compete in purebred competitions on a regional basis. We normally own five dogs at our home, we currently own three. We have produced one litter in 35 years of dog ownership.

According to the language proposed in your dog enforcement rules, we could be considered a kennel. Because our dogs are very large Irish wolfhounds, many hotels and motels do not let us stay in their facilities when we travel to meet or compete. Wolfhounds are also extremely expensive to board because of their size. As a result, wolfhound owners often stay at other wolfhound owner homes. If this is done 3-4 times a year, the 26 dog limit can be met quite easily by any number of private citizens. This is not realistic or probably even intended by the language of your proposal.

Like you, we cannot abide the puppy mill situation in Pennsylvania. We congratulate you on trying to amend this serious problem. However, the baby is going out with the bathwater. Please reconsider some of the language in your proposed document.

Please amend the definition of "temporary housing". As written, it would require thousands of small residential hobby and show breeding households to become licensed. It would be impossible for us to comply with this regulation and an extremely expensive, onerous and unessential regulation for you to monitor and enforce. Dog owners and residential small breeders who keep their animals at their homes would be covered by your sweeping proposed changes. Surely this is not your intent, as these animals are our family members, not commercial livestock.

Active canine hobbyist groups are a significant benefit to the health welfare and safety of dogs. For example, purebred clubs as the Delaware Valley Irish Wolfhound Association (IWADV) are American Kennel Club sanctioned. Every one of our members is a residential dog owner or small breeder. Our club provides ongoing canine education programs to member dog owners and interested others. Canine education is essential to support the ongoing health, welfare and safety of dogs. The protection of dogs must extend beyond the point of acquisition by a new owner. Canine hobbyist clubs are an effective means to accomplish this goal. We need to be protected

from the sweeping language in your proposed rules.

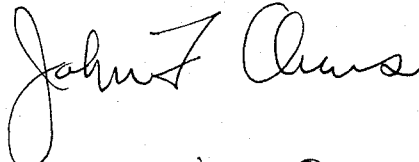
Additionally, the suggested housing and social interaction limits of dogs described in the proposed rule changes is counter to all proper socialization and training practices.

Can you find a different way to define the threshold of applicability of these proposed regulations? We understand that Illinois had a five unspayed bitch limit in their threshold of commercial kennel applicability. The five bitch limit applies whether the bitch is intended to be bred or not. This threshold has worked for 30 years in that state. Such a definition of applicability would be a much more palatable means of defining the scope of your proposed regulations.

Thank you for your time and attention.

Sincerely,

John F. Owens



Susan C. Owens



Cc: Edwin B. Erickson, Senator
Thomas H. Killion, Representative