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INDEPENDENT REGULATORY  
REVIEW COMMISSION

January 15, 2007

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 very disturbed by the proposed amendments to the Pennsylvania dog law regulations issued on December 16, 2006. My name is Judith A. Swanson residing at 168 Country Lane, Pottstown, PA 19465. My telephone number is 610-327-3068. I have been breeding and exhibiting dogs for five years and take pride in the health and welfare of my litters and adult dogs. I am extremely concerned that if these amendments are enacted the ability to purchase, care for, raise, rescue, etc. dogs that are healthy, well socialized and good members of society will become a thing of the past. I have toy breed dogs and cannot imagine whelping them in a facility unattached to my home in a "commercial kennel". Toy breed dogs are sometimes 1 ½ - 2 ounces when born and could not withstand the rigors of the new standards. I whelp these puppies in my living room where conditions are much more conducive and superior to these standards. New litters sleep right next to me so that I am able to hear if the litter becomes distressed and I am able to make sure the dam is nursing the puppies. I would not be able to comply with these new standards and frankly would hope that the Agriculture Department would not find these standards more appropriate than what I offer today.

I have been attempting to find research that shows a scientific foundation for these new standards but have been unable to find such research. I am questioning where these new standards were found. In speaking with other breeders it appears that almost everyone who wishes to comply with these regulations would be required to completely renovate their existing facilities at a huge cost and most would not be able to comply, including myself.

When puppies are several weeks old, socialization becomes extremely important and many people enroll their pets into a "Puppy Kindergarten". These new standards would not allow different size dogs to intermingle for socialization. We also have a large breed dog that interacts with our toy breed dogs and it is a wonderful sight to see the puppies climbing all over him while he sits there cleaning them. What purpose would be served to disallow this socialization except to have differing size dogs become much more aggressive or fearful of other dogs? Are we not hoping to provide comfort and a peaceful environment for our dogs?

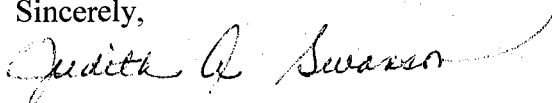
The record keeping requirements would put an excessive burden on all involved. I do not understand the useful purpose of requiring record keeping with regard to exercise, cleaning, feeding and other aspects of kennel management since there will be no way to verify the accuracy of the information. I do acknowledge that there is gross mistreatment of dogs in the "puppy mills" but that is not the situation in most "hobby breeder's homes". I would request that the laws that are currently in place be administered to eliminate the offenders.

I do not understand how rescue groups, veterinarians providing day care and boarding facilities as well as the hobby breeders will be able to comply. Having to count a dog that leaves one's property and then returns will be burdensome as well as providing inaccurate counts. What about when a puppy is sold but the new owners do not want to register the dog with the AKC or another organization. It appears that that dog is still in the care of the breeder when in fact the dog belongs to someone else. Co-ownership of dogs would have one dog actually counting as two since both owners have to claim the dog regardless of where the dog resides. My family just had a death in the family and several friends took my dogs to temporarily house them until the services were completed. Again, these wonderful friends would need to claim these dogs in their totals when all they did was provide a much needed and appreciated service to a friend. Would it have been better to leave the dogs unattended at my home while we were away? I think not.

I believe that inhumane and substandard kennel conditions should not be tolerated and should be corrected but enacting these regulatory changes, that I believe are not needed, will not provide the outcome that is expected. The people who truly have the best interest of the dogs will be the ones "punished" by these amendments. I do not understand why the enactment of these amendments are expected to improve the quality of life for the dogs in the kennels.

The Bureau has conceded that it is extremely difficult to enforce the regulations currently in place. Adding additional requirements will make the process of correcting these inhumane deficiencies even more difficult to enforce. I would request reconsideration of these new amendments and a more stringent enforcement policy enforced with the laws already on the books. The people that have the welfare of the dogs at heart are the very people that will be most effected by the enactment of these amendments and I would hope that this was not the intent of the bureau or legislature. I would ask for myself, hobby breeders and most of all the dogs that these amendments be loudly defeated.

Sincerely,



Judith A. Swanson