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

January 16, 2007

Dear Ms. Bender,

I had the pleasure of meeting you a few years ago at the Lehigh Valley Kennel Club Canine Learning Experience which you visited to get the "truth" on tattooing dogs without them being sedated at a veterinarian – **another questionable regulation change which was being proposed at that time.** I remember thinking afterwards that it was refreshing to see Mr. Hess's replacement also have the common sense, logic and fairness that he used while he was Director of the Bureau.

I realize that you will not personally get to read many, if any, of the letters that are (hopefully) pouring in regarding the new proposed PA. Dog Law Regulations. I can only hope there's a chance you get to read this one. I also hope you once again will use common sense and fairness in making **reasonable recommendations** on some adjustments needed to a few of the overly restricted sections of this proposal - as presently written.

That is why I am writing, not to complain or to come across as "whining", but rather to offer some thoughts and insight from a small hobby breeder with 30 years experience in showing and grooming, as well as an owner of a small boarding kennel for 25 years.

I would be the first one to be outraged at the concept of a dog chained to a 55 gal drum – but that is as extreme as "recording the date and time that each water bowl is "sanitized" daily." **Question: How can that ruling even possibly be enforced?**

Also, after doing some checking over the last two weeks, I have discovered that the proposed regulations on "sanitizing walls and floors every 24 hours" are more strict than at the following facilities: a day care for youngsters, an assisted living facility, the County Children's Home and even the ICU of our local hospital. My husband was a patient for 3 days this fall at a local hospital and not once did they "sanitize" the walls and floor, or even wet mop the floor while he was there. So my next **question is: why do these proposed regulations require more "sanitizing" for dogs than for children, seniors or hospital patients?** Plus these cleanings also must be documents by the hour of each day as well. Again, how can that be enforced?

Perhaps the problem/solution to this outcry by the Governor regarding "puppy mills" isn't more laws, but simply a problem of inadequate enforcement of the current dog laws. If this is indeed the case, as I fear it might be, why not begin there? Have the Gov.'s advertised independent "swat team" visit the puppy mill operations and see if they are truly compliant with the present regulations. Plus, from what I've uncovered recently, **many of the worse offenders are not even licensed.**

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I support reasonable dog laws and I believe a realistic regimen of housekeeping and kennel management is necessary. With the current unannounced inspections, if done thoroughly, should continue to show who is complying and who is not. Perhaps each kennel should post a schedule and a daily procedures outline - but without adding the necessity to "make-up" daily "time records" that will **surely become a common practice for those kennels that already are irresponsible.**

I, for one, look forward to my inspections and walking through my boarding kennel with our Dog Law Office, pointing out any changes or improvements we've made since the last visit. I am very proud of my kennel. It is clean, bright and smells good, our "guests" are happy and healthy and my clients love us. If there would ever be an area where the Inspector saw room for improvement we would make whatever changes were necessary to meet those suggestions. **I do resent being told I must change what has worked so well for 25 years because of puppy mills treating their dogs like "livestock".** Boarding kennels and private breeding kennels now pay **different license fees**, so why can't there be **different requirements** for daily operations based on the "size" of the operation and the reason the dogs are in a kennel? That would not be discrimination - It would just be common sense. The state of PA owes all those "bred-to-death" breeding dogs at least the acknowledgement of why they exist.

I think there is a big difference between a small up-scale client boarding facility (or motel) where a dog spends a week on vacation and a 500+ dog breeding facility (or factory) where those dogs spend their entire life in a crate. **Why not a scale of management requirements** similar to the 1-A, 2-A and 3-A ratings for the PA public school system? The size of the school determines funding and grants, sporting events, etc. Everyone knows the rules and few complain. Wouldn't it make sense to have the **number of inspections per year based on the number of dogs housed in each breeding facility?** For example, over 100 dogs should be visited 4 times a year, over 500 should be visited every 60 days, etc. I honestly can't even begin to imagine managing 500 dogs properly.

As for conscientious, hobby breeders, like myself, who don't wish to "lie", these new regulations, if passed, will be enough of an unnecessary burden to make many consider giving up their kennel license. I know I will make sure I keep below the 26 dogs per year to avoid the requirements for a private breeding license if this proposal does pass. That's sad, but that's what I will be forced to do. **I WILL NOT raise my puppies in a kennel environment** because, as they are proposed, any home will not "pass" the rigid proposed regulations.

If this happens as widespread as I fear it will, the pure breed dog fancy will sadly lose a number of pure-breed mentors and very knowledgeable people who could help the new up-coming show breeders. This won't take long for a **trickle down effect to impact on pure-bred dogs.** People who are shopping for a family pet will turn to - you guessed it - the pet stores! And where do the pet stores get their puppies - that's right, from puppy mills. Even worse is the growing sale of puppies on the internet.

So, even though Gov. Rendell said *"We are taking strong steps to protect consumers, reputable breeders and kennels..."* the Gov. **by this action, will in fact, be sending the PA puppy mills even more business!** I don't understand what brought this all about but with the amount of revenue to the State from these big breeders and the large political contributions I was told many of them make, I fear the puppy mills will figure out how to work around these regulations. And once again the "little guy" will pay the price. As my father used to wisely tell me... "just follow the money." I appreciate the chance to have my say, for whatever it's worth. Now all I can do is sit back and hope and pray reason might prevail.

Respectfully,
Nancy Kapanka

