

Jessie L. Smith
 Secretary for Dog Law Enforcement
 2301 N. Cameron Street
 Harrisburg, PA 17110
 January 16, 2007

Dear Ms. Smith:

I would like to bring to your attention the newly enacted General Provisions of 7 Pennsylvania Code, Part II. Dog Law Enforcement Bureau

This document - which purportedly controls how all kennels of all classes must be constructed and managed - transcends humane, safe and clean guidelines for the care of dogs, and seems to be a model of the ideal dog care facility plan for a person or company with limitless funds. It also muddies in some places the difference between: facilities which exist to rescue or harbor stray or abandoned dogs, facilities which breed dogs, facilities which care for people's pets, and veterinary hospitals.

Please consider the following

21.14 Kennel Licensure Provisions:

iii) From where the dog came . . .

5) Kennel records

B) Boarding Kennels (et al)

vii) How and . . .

C) Whether a dog is spayed or neutered and whether an agreement to . . .

D) The date of the dog's last vaccination, worming or any other medical treatment . . .

Except to determine the status of required immunizations, these provisions, which are part of a dog's medical record, have no place in a boarding kennel, nor – due to privacy policies adhered to by many veterinarians – are they available to the operators of boarding kennels.

21.22 Housing

(c) Adult dogs shall be segregated by sex except for health, welfare or breeding reasons: Many owners of multiple dogs who board them desire them to be housed together. Does this meet the "welfare" exception of this rule?

21.24 Shelter, housing facilities and primary enclosures

(f) the following criteria apply to both indoor and outdoor facilities

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(11) The housing facility including . . .

(ii) All floor or surface drains and gutters shall be at least 6 inches in diameter. This is excessive! I know of no boarding facility – including ones built for multi-millions of dollars – which adheres to this. Retrofitting to meet this standard would entail chopping out concrete floors in virtually every commercial boarding kennel in Pennsylvania for no gain. A 3" diameter drain has long been considered to be adequate and sanitary, and at most some knowledgeable architects and designers of pet care facilities will recommend 4" diameter (to allow a stray tennis ball to pass through without blocking the drain or gutter).

(iv) Where an indoor kennel has outside runs attached, drains or gutters shall be installed between the indoor and outdoor section . . . This is a prime example of mandating a construction technique which makes an employee's cleaning job easier, but in no way benefits the dogs being cared for. Again, retrofitting to this mandate would entail completely tearing out the working areas of the vast majority of Pennsylvania kennels. This belongs in a "how to do it if you have enough money" manual, not as a mandated and regulated procedure!

(v) Outdoor kennel runs shall be sloped to a gutter located immediately outside . . . Once again, this is an ideal way to construct a new facility, but is not necessary for the stated purpose of sanitation and drainage. Many facilities do the job perfectly well with a mop and bucket of disinfectant.

(viii) . . . The kennel floor or surface shall be sloped . . . See above comments: quick water drainage and drying is accomplished in many facilities by use of a squeegee and good ventilation. This is again a good technique for new construction, but should not be a requirement for facilities already built and operating in a sanitary fashion.

(14) Open supplies of food or bedding must be kept in leak proof containers with tightly fitting lids . . . Good idea for food; bad idea for bedding: blankets, pads, benches, etc. are stored by most facilities indoors where they do not get rained on or wet.

21.25 Temperature Control

(d) Indoor kennels . . . a slab temperature of not more than 55 degrees Fahrenheit This is an obvious error. Many facilities employ radiant (in the floor) heat; this would assure that the temperature inside the building remains at or below 55 degrees in cold weather.

21.28 Food, water and bedding

(a) . . . Leftover food shall be disposed of promptly – meaning within two hours of feeding Many dogs free feed in their home environment and benefit from the same procedure while boarding. There is no reason to dispose of uneaten dry dog food after two hours.

21.41 General requirements

(c) . . . keep a record of the following for each dog housed in the facility:

(6) Records of veterinary care for each dog These provisions, which are part of a dog's medical record, have no place in a boarding kennel, nor – due to privacy policies adhered to by many veterinarians – are they available to the operators of boarding kennels.

These are only some of the problems with these Provisions. While many of these ideas would make sense in building a new facility or in a complete renovation of an old facility, they are in no way necessary to the goals of sanitary and humane care for dogs in kennel facilities. To impose these rules on the existing commercial boarding kennels in the Commonwealth would be to shut down the entire industry!


A couple possible alternatives to these rules would be to:

a- revamp them with people from the industry offering input as to what is effective and reasonable. One such person is Linda Lowney, with decades of experience in the industry, and a current and original member of ABKA since its formation in 1977.

b- consider alternative plans. The ABKA (American Boarding Kennels Association), the national trade association for pet care providers, has developed a set of guidelines which is used in their Voluntary Facilities Accreditation program, and has shared these with other states for similar purposes.

I urge you to reconsider carefully these regulations before they deprive tens of thousands of Pennsylvania dog owners of a place to care for their dogs!

Sincerely,



Bob Payne, CKQ