

January 17, 2007

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John Gerber
1350 Greenwood Circle
State College, PA 16803

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 a resident of Centre County and like thousands of dog owners throughout PA, show dogs at local, regional and national shows. I own only a few dogs and at this time do not breed, raise puppies nor do I run a kennel. I am, however, ever vigilant against those who might abuse dogs in any form and despise puppy mills.

I am writing to comment on the proposed amendments to the Pennsylvania dog law regulations issued on December 16, 2006. I believe that inhumane and substandard kennel conditions should not be tolerated, but I do not agree that most of the proposed regulatory changes are needed, nor would necessarily have a beneficial outcome if adopted. Many are impractical, excessively burdensome and costly, unenforceable, and/or will not improve the quality of life for the dogs in these kennels.

If I decide to breed a few litters, this legislature, would bar me from any breeding program without enormous and unnecessary financial burden. In short, a small breeder 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.

INDEPENDENT REGULATORY
RENEW COMMISSION

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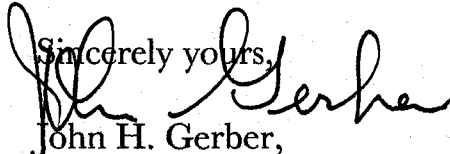
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I am most definitely in favor of closing down puppy mills which represent the most egregious circumstances and we all know that such egregious circumstances already violate existing regulations.

The current proposal appears to be merely a laundry list of ideas for improving the environment for dogs that has no connection to specific instances in which the welfare of dogs could not be secured, and no basis in science or accepted canine husbandry practices. I urge that this proposal be withdrawn.

Please note that I associate myself with the more detailed comments on this proposal by the Pennsylvania Federation of Dog Clubs.

The Bureau has tacitly conceded that its current regulations have not been adequately enforced. If, after implementing its recently announced enhanced enforcement program, the Bureau finds it is still unable to prevent inhumane treatment of dogs because of specific deficiencies in the existing regulations, it should cite these specific deficiencies and propose changes based on them.

Sincerely yours,

John H. Gerber,
A Responsible Dog Owner