

YORK KENNEL CLUB

Incorporated

P.O. BOX 346 YORK, PA. 17405

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

January 17, 2007

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INDEPENDENT REGULATOR
PENNSYLVANIA
COMMISSION

Dear Ms. Bender,

The York Kennel Club based in York County, PA is an all-breed dog club dedicated to the advancement of purebred dogs. Our club membership includes breeders, dog show exhibitors, owners/fanciers of various pure breeds, active breed rescuers, retirees from the afore mentioned activities and foremost individuals devoted to maintaining the privilege of pet ownership.

We are writing to comment on the proposed amendments to the Pennsylvania dog law regulations issued on December 16, 2006.

While we agree inhumane and substandard kennel conditions and treatment of dogs produced by commercial (for profit only) should not be tolerated, our membership does not concur with most of the proposed amendments to the Pennsylvania dog laws. Many of them are impractical, excessively burdensome, costly, unenforceable and will not improve the life quality of life for dogs in these kennels. For example:

*The definition of "temporary housing" would require thousands of small hobby and show (residential) breeders to become licensed. They could not possible comply with these regulations and should not be required to do so. The obligations of owners of "temporary housing" which are made subject to inspection by the proposal are not enumerated or limited.

*The space and exercise requirements proposed have no accepted scientific or husbandry basis. Ethical breeders would not think of jeopardizing their "family members" health or well being by not providing exercise and space according to the needs of their particular breed.

*The proposed regulations would require renovation or rebuilding of kennels which are currently in compliance with federal and/or state standards. This would bear a severe hardship on not for profit breeders. Many of these breeders maintain their dogs in their residences and provide care and conditions far superior to those specified in the new standards. They cannot modify their residences to comply with the rigid commercial proposed requirements.

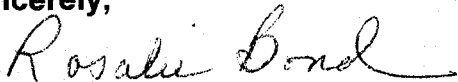
*The proposed requirements addressing record keeping of exercise, sanitation and other kennel management duties would only be an extra burden to the already meticulous small/hobby breeder's regime. This seems like an area that would very hard to verify any inaccuracies even when departure from the ideal seemed evident.

The idea that breeders who show, train and breed their dogs should be regulated as to how to exercise and socialize their dogs is an invasion of and affronts their expertise in those areas. Dog owners with years of knowledge and success as trainers, handlers and breeders should not be lumped with the likes of a commercial breeder. Different breeds of dogs have different needs in those areas. Competent breeders are aware of them and *use good judgment to optimize every part of their efforts.

These are just a few of the problems in the proposed amendments. The laws that now exist do actually protect the welfare of the animals in kennel situations. They need to be more strictly enforced and more inspections of suspect kennels could be more frequent. Since the dog limit of 26 a year is in place many hobby/fanciers breeders are affected. More regulations are just not the answer. The proposed regulations appear to be designed for large commercial breeders and closely resemble livestock raising practices. Because it would be unjust in our democratic society to discriminate as to who these proposed regulations would affect we ask please do not unnecessarily burden those who are doing a god job.

Perhaps since the Bureau is still unable to prevent inhumane practices in kennels it *should address the reasons why and cite those certain deficiencies to make* improvements based on those specific deficiencies. The York Kennel Club urges that the December 16, 2006 proposal be withdrawn.

Sincerely,

A handwritten signature in cursive script that reads "Rosalie Bond".

Rosalie Bond - President, York Kennel Club, Inc.