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Jane Frantz  
979 Deturksville Road  
Pine Grove, PA 17963  
January 18, 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:

My name is Jane Frantz and I live at 979 Deturksville Road, Pine Grove, PA. I have owned dogs for many years. I also have gotten involved in training and showing my dogs in Obedience classes. I plan on breeding my female Labrador retriever in the near future to better improve the breed. I will only be a small hobbyist breeder and only plan on breeding a few times.

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, or 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.

I have included the following reasons why I do not believe this PA dog law regulations amendments should be passed.

The definition of "temporary housing" would require thousands of small residential hobby and show breeding households to become licensed which could not possibly comply with the regulations, and which there is no reason to regulate.

The obligations of owners of "temporary housing" which are made subject to inspection by the proposal are not enumerated or limited.

Smaller breeders and dog owners 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.

The proposals pertaining to housing and social interaction of dogs of different sizes are contrary to good husbandry, socialization and training practices.

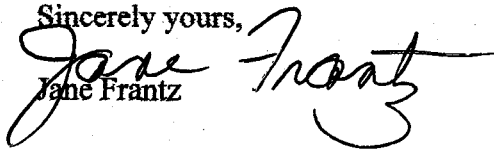
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The above is far from a complete list of the deficiencies with the proposed regulations. I also associate myself with the more detailed comments on this proposal by the Pennsylvania Federation of Dog Clubs.

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. 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.

Sincerely yours,

  
Jane Frantz