

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

January 18, 2007

Dear Ms. Bender,

I am writing to express a few concerns that I have with regard to the proposed Dog Law Act 225, which was issued on December 16, 2006.

I appreciate that fact that the bureau has helped to improve the dog laws in the past several years. However, the current proposed regulation changes have appeared to be intentionally burdensome and go far beyond mere rulemaking.

The proposals add completely new categories and definition. These changes must be addressed through the legislative process.

The proposed changes require the kennel owner to record every time a water bowl or food pan is washed, every time the primary and secondary pen enclosures are cleaned, and the feeding and watering dates and times, etc. All these burdensome and excessive requirements will require a substantial increase in manpower with many hours dedicated to filling out written bureaucratic reports and divert the small business owner's time away from caring for their animals.

The Departments direction and intentions are neither attributed as accepted canine husbandry practices nor substantiated by science. The Department should base their changes on education to improve the industry. I request that this proposal be withdrawn.

Yours sincerely,

*Reuben Z Martin*

Reuben Z Martin  
526 Quarry Rd.  
New Holland, PA 17557

INDEPENDENT REGULATORY  
REVIEW COMMISSION

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

January 19, 2007

Dear Ms. Bender,

I am writing in response to the proposed amendments to the Dog Law Act 225 which was issued on December 16, 2006.

The current proposed regulation changes have appeared to be burdensome and beyond rulemaking. The proposals add completely new categories and definition to the existing laws. These changes must be addressed through the legislative process.

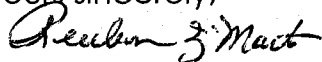
The proposals referencing housing and social interaction of dogs of different sizes are contrary to good husbandry, socializing and training practices. Furthermore, there is no scientific or accepted husbandry basis for the amended space and exercise requirements.

In addition, the proposed regulations call for the temperature of the kennel floor to be 50F° in the warm weather. Many kennels are air conditioned to a comfortable 70F°. A dog sleeping on a 50F° floor can develop hypothermia and become ill or die. For temperature, lighting, cleaning, exercise, housing, and veterinary care, the attending veterinarian should set forth and approve procedures specific for the kennel buildings and breeds of dogs.

The proposed changes above will require Pennsylvania's licensed and inspected kennels to be demolished and rebuilt. The average cost will be between \$30,000.00 and \$500,000.00 per kennel, if the proposed laws are adopted.

The current proposed appears to be over idealistic in term of improving the welfare of dogs. I urge that this proposal be rescinded and an approach similar to the USDA standards be developed.

Yours sincerely,



Reuben Z Martin  
526 Quarry Rd.  
New Holland, PA 17557