Independent Regulatory Review Commission Attn: Arthur Coccodrilli, Chairman 333 Market Street, 14th Floor Harrisburg, PA 17101

2559

January 19, 2007

Dear Chairman Coccodrilli,

I am writing to comment on the proposed amendments to the Dog Law Regulations Act 225 issued on December 16, 2006. I personally think that many of the changes are impractical and burdensome, and will not improve the quality of life for dogs in kennels.

The proposed regulations will require a substantial increase in manpower with many hours dedicated to filling out bureaucratic reports or recordkeeping which the department already has.

Kennels have been custom built to comply with Pennsylvania Department of Agricultures Dog Law Enforcement standards that were based on USDA Standards. The proposed changes of this section will require the demolition of Pennsylvania's licensed and inspected kennels and the rebuilding of entirely new dimensioned kennels. There is no scientific basis for the change; the average cost per kennel will be between \$30,000.00 and \$500,000.00 each.

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 I urge that this proposal be rescinded and an approach similar to the USDA standards be developed.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 truly,

Menno B. Esch 185 Truce Road New Providence, PA 17560

