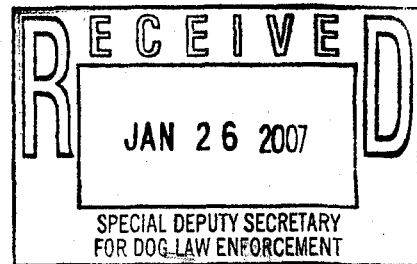


2559

# Town & Country Kennel Inc.

*and Pet Care Center*

January 21, 2007



Jessie L. Smith  
 Special Deputy Secretary  
 Dog Law Enforcement  
 2301 North Cameron Street, Room 210  
 Harrisburg, Pennsylvania 17110-9408

☛ Day Care

☛ Spa/Conditioning

☛ Grooming

☛ Boarding

☛ Pet Shipping

☛ International Transport

☛ Pet Supplies

☛ On Site Buxmont Veterinary Hospital

Dear Jessie L. Smith:

I have been reading over and over the proposed regulations. My efforts are an attempt not to overlook anything. Though I know that I have.

I am very pleased with the inclusion of the sentence on pg.21 "All temporary homes shall be subject to inspection by the Department. Sometimes caring individuals with good intentions may become dangerously over crowded when their real attempt is to help.

As you may or may not remember during the meeting of the board in December, 2006,

I am concerned that the new standards do not exhibit any flexibility in regards to the type of dog housing requirements, wither it is a shelter, dog breeders, pet boarding, or commercial breeders. I feel that all of those would have similar, though not the exact same needs to be appropriate and beneficial to the dogs that they are caring for.

In the event that these new rules are approved, I also do not see any provisions or direction on how or when a currently licensed kennel would be required to make structural corrections to an existing facility. My hope would be that if they are currently compliant, that this would be acceptable at this time, but with future renovations or expansions that they would be required to make all corrects to bring their facility in to compliance with the new rules and regulations.

Those that don't meet the present standards and not licensed should be required to reconstruct their kennel as soon as possible in a manor that hopefully will allow them to maintain a business flow. If permitted that time frame to be scheduled by the Dog Law Board or the official in charge. That scheduling should not be available when there is not at the present time adequate care and housing available for all of the dogs contained in that kennel. The availability to retain an active kennel license during this renovation would be at the discretion of the board or official.

E-mail [tkennel@townandcountrykennel.com](mailto:tkennel@townandcountrykennel.com)

393 Langhorne Ave. • Langhorne, PA 19053 • Phone (215) 752-3661 • Fax (215) 752-7109



Pg. 22

5. Kennel records.

Kept in what form or format? Requirements for information determined by type of kennel, service provided?

Pg.23

(3) Agency or person that last owned the dog \_ if known \_ or the \_ organization, agency or person delivering the dog to the kennel.

Pg.26

(v) If the dog is old enough to receive a rabies vaccine.

Pg.32 – 33

Are assorted sizes permitted to be exercised in same yard if individually controlled on a leash?

Pg.45

Temperature control.

(d) A temperature of 55 degrees Fahrenheit of a concrete floor would be very cold for a dog to lay on even with bedding provided.

Pg. 46

(3) Ground level ventilation to assure dry kennel floors during cold weather.

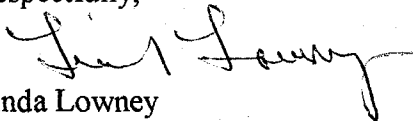
This would create a cold drafty area on the floor where the dogs lay. Especially if the floors are at a temperature of 55 degrees.

Pg. 50

(b) Exercise areas must be sanitized and all stools removed prior to the next group of dogs being exercised in that area.

Require that all areas be cleaned and all waste material from the dogs be removed prior the next dogs arrival in that area. Excessive sanitizing may expose dogs to more chemicals than necessary. Thereby creating a possible health hazard for the dog.

Respectfully,



Linda Lowney  
President

Town & Country Kennel, Inc., and Pet Care Center

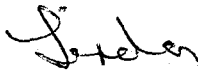
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Jessie,

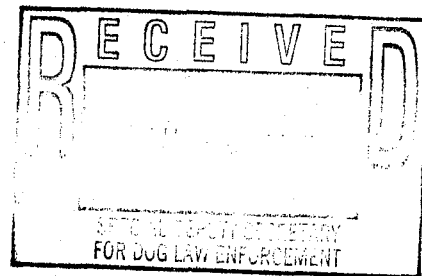
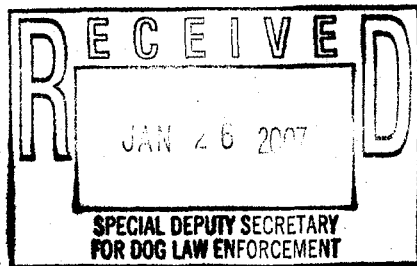
P.S-

This is the format that we have developed to highlight some of the areas that will be difficult, if not impossible, for some pet boarding facilities to adhere to. By directing them in this fashion I think it encourages their involvement and they won't get bogged down in a document of this depth. We've pulled information from different portions of the regs that would be related to various pet fields. Do you feel it is a good way to pursue this? Thanks for all you assistance and support.

Regards,



Linda Lowney  
Town and Country kennel  
393 Langhorne Ave  
Langhorne, PA 19053  
Phone: (215)752-3661  
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# Town & Country Kennel Inc.

*and Pet Care Center*

☛ Day Care

Greetings,

☛ Spa/Conditioning

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Transport

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Buxmont  
Veterinary Hospital

Contained in this correspondence, directly from the new rules and regulations, are the proposed dog quarters/ housing and exercise requirements. Please read over these carefully and thoroughly. How do they reflect on the type of pet care service and housing you provide? Do they meet the safety and health needs of the pet? What suggestions and alternatives would you propose that would better suit the animal's needs? Please respond with recommendations, comments, or concerns to improve these laws for the pet as well as the pet care industry.

Please forward all recommendations, comments, or concerns to...

Special Deputy Secretary  
Jessie L. Smith  
Dog Law Enforcement  
Department of Agriculture  
Agriculture Office Building, Room 210  
2301 North Cameron Street  
Harrisburg, PA 17110  
Phone: (717) 214-3447  
Fax: (717) 346-3301  
E-Mail: [jlsmith@state.pa.us](mailto:jlsmith@state.pa.us)

Regards,



Linda Lowney



Below is a list of certain areas in the “Dog Quarters, Housing and Exercise” sections that I find troubling and feel need to be addressed immediately. These are just a couple of highlights that I have selected from the new rules and regulations.

- What if primary enclosures are constructed in a permanent manner?
- How then can that wall be removable?
- Do these structural changes have to be made on existing construction, or only on newer construction?
- To what definition determines a dangerous or aggressive dog?
- Does the need of exercise requirements still pertain to “dangerous” dogs?
- During housing (at owner’s request) are we permitted to house together, different sizes and sexes of animals?

## **Dog Quarters/Housing/Exercise**

Indoor and outdoor housing facilities for dogs shall be maintained in a manner to protect dogs from injury, insure sanitary conditions set forth in this regulation and shall be maintained in a manner complying with all other conditions required by this chapter and to contain the dogs.

- (A) Where the primary enclosures are stacked or set side by side, a tray, wall, partition or other device approved by the department which does not allow for feces and urine to pass between primary enclosures or soil the primary enclosure of another dog, shall be placed under or between, or both, the primary enclosures. The tray, wall, partition or approved device shall be impermeable to water, removable, and able to be easily sanitized.
- (B) Dogs that display ferocious or aggressive behavior shall be kept [inaccessible to other dogs] in such a manner as to be unable to come in physical contact with other dogs.
- (C) Adult dogs shall be segregated by sex except for health, welfare or breeding reasons.
- (D) The dog shall be able to lie in a lateral recumbence (on its side or back) with legs fully extended, without head, tail, legs, back or feet touching any of the side enclosure.
- (E) Each dog housed in a primary enclosure shall be provided with [a] twice the minimum amount of floor space set forth below. [Which] The minimum amount of floor space shall be calculated according to the following procedure:

- i. Measure the length of the dog, in inches, from the tip of its nose to the base of its tail.
  - ii. Add 6 inches to that number.
  - iii. Square that sum.
  - iv. Divide that product by 144
  - v. That quotient equals the minimum required floor space for that dog, in square feet.
- (F) In addition to space requirements, each dog shall receive 20 minutes of exercise per day. Dogs shall be observed and supervised during exercise...

### **Exercise**

If gravel or stone is utilized, it shall be constructed in layers so as to provide proper drainage and footing that will not cause injury to the dogs. The first layer of gravel or stone shall be a course layer of number 2,3, or 4 crushed durable rock and the top layer of gravel or stone shall be a fine layer which shall fill in the courser layer of stone or gravel and result in an even surface. The first layer shall be of a thickness adequate to provide drainage (approximately 4-5 inches) and the top layer shall be of a thickness adequate to assure none of the bottom layer stones are protruding (approximately 2-5 inches). The surface shall be kept in good repair at all times.

- (A) Small dogs (35lbs or less) shall be exercised together and may not be put in the same exercise area with medium or large dogs.
- (B) Medium sized dogs (36- 60lbs) shall be exercised together and may not be put in the same exercise area with small or large dogs.
- (C) Large sized dogs (61-90lbs) shall be exercised together and may not be put in the same exercise area with small or medium dogs.
- (D) Giant sized dogs (91lbs or greater) shall be exercised together and may not be put in the same exercise are with small, medium, or large dogs.
- (E) Aggressive or anti-social dogs shall be exercised alone.
- (F) Spayed and neutered dogs may be exercised together. Otherwise males and females shall be separated and may not be exercised at the same time in the same exercise enclosure.