

IRRC

Attn: Mr. John H. Jewett
14th Floor Harristown 2
333 Market St.
Harrisburg, PA 17101

January 22, 2007

RE: Proposed Changes to PA Dog Law Regulations (36 Pa. B. 7596)

Dear Mr. Jewett,

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 I request that this proposal be withdrawn.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,



Eli B Smucker
317 Springville Rd
Kinzers, PA 17535

INDEPENDENT REGULATORY
REVIEW COMMISSION

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