

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

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INDEPENDENT REGULATORY
 REVIEW COMMISSION

Dear Ms. Bender:

I have been involved in dogs for many years. I show in obedience, rally, agility as well as conformation. I would never ever want to have to purchase a dog that has not been raised in a loving family situation. I have bred a litter in the past and am looking forward to breeding another litter in the very near future. When picking a "mate" for my bitch I probably put more time and effort into it than most people do before marrying and having children! I breed my puppies to be correct in conformation as well as being able to perform in the many venues that are out there to participate in. This cannot be done when you do not breed for quality but breed for quantity. This is new bill is totally ridiculous. My puppies are raised in a home situation and have human interaction all the time. They are not in a kennel with limited interaction. People may come to my home at any time to see my puppies and how well socialized they are before going to their new forever homes.

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.

Examples of problems with the proposal are the following:

- * 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.
- * 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 record keeping requirements with respect to exercise, cleaning, and other aspects of kennel management are excessively burdensome and serve no useful purpose, as it would be impossible to verify their accuracy in all but the most egregious circumstances. Such egregious circumstances already violate existing regulations.

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,



Lisa A Leipold
 806 Cleveland Ave
 Altoona, Pa 16602