

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

24 January 2007

Dear Ms. Bender.

The purpose for this letter is to comment on the December 16, 2006 proposed dog law regulations. While some of the proposed regulations were long needed others will be a deterrent to small breeders as well as those of us who show dogs.

My family has owned dogs for over 50 years. We have bred and trained dogs, some to their AKC Championships. Our dogs all attend training classes. My wife and I are members of several dogs clubs, both breed and all breed, who put on annual Breed and Agility shows in the Commonwealth. Further I have been on the Board of Directors of the Delaware County Kennel Club for a number of years. This club was awarded both Federal and State commendations for their service to the Community.

Overall the proposed amendments are confusing to read as the preface of the report and the main text differ in that some of the items in the preface are not backed up in the main text and visa versa.

The need for better conditions in substandard large kennels has been a known fact for a long time. Just drive up the PA turnpike toward Harrisburg and one will see a large number of dogs in a pen, many of which live in unclean conditions. Due to a discussion on puppy mills a fence has been put up to block out ones ability to see the conditions and the dogs. The problem here is the lack of State personnel to enforce today's laws.

The report proposes conditions with little difference between small and large breeders. This will have a direct impact on Pennsylvania small breeders and owners. Further, why should anyone with dogs move to Pennsylvania? Will it impact the attendance at Dog shows which are today struggling with lower attendance and the higher cost of travel by the handlers? Has any thought been given to local zoning and its impact on enhanced kennels? A move to Delaware, Ohio or New Jersey becomes a possibility.

Social interaction of dogs is an important training item. It is a necessity. Without it how can you properly train a dog to act when with other dogs? Further, show dogs should not be required to live their life on concrete.

The question of co-ownership of dogs appears unclear. Many breeders co-own dogs with the people to whom they sell their dogs. This allows either party to show their dogs under the bred by classification. Where does this fit in the proposed regulations should the dog or say the breeder lives out of state?

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Further, there is the subject of temporary housing. Should an out of state handler stay with you prior/after a show with a dog in their van? Is this temporary housing? A further definition is needed.


In the Proposed Dog Law Enforcement Rules and Regulations there appears to be no place to accommodate dogs in case of a disaster. Today a state and county wide effort is underway to solve the possible problem of – When a disaster strikes, who will take care of them? This is under PSART (Pennsylvania State Animal Response Team) and is supported by the Pennsylvania Department of Agriculture and the Pennsylvania Veterinary Medical Association. The group is looking for people willing to house animals (dogs?) in case of an emergency. Who would do it under the proposed law?

I could go on and on. I however subscribe to more detailed comments which will be forthcoming on the proposed regulation changes by the Pennsylvania Federation of Dog Clubs.

On an overall basis the subject proposal should be withdrawn. Staff should be added to police today's large puppy factories and breeders. Specific deficiencies in the current law should be studied by a group knowledgeable on the subject, proposing changes to be acted upon.

I look for a favorable outcome on the above subject, one that will be a plus for the dog's of Pennsylvania, not one which will drive our love of dogs, the sport of Dog Shows and the pleasure we have of having a four legged friend out of Pennsylvania.

Sincerely Yours,


Nelson E. Ockerbloom
Board Member Delaware County Kennel Club

14 War Admiral Lane
Media, Pa. 19063

cc: Governor Edward Rendell
Pennsylvania Federation of Dog Clubs, Inc.

SENATOR DEMITRI F. PILEGGI
REPRESENTATIVE THOMAS LULLICH

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