

HUMANE SOCIETY OF CAMBRIA COUNTY, INC.

January 25, 2007

Mary Bender, Director
 Bureau of Dog Law Enforcement
 2301 N. Cameron Street, Room 102
 Harrisburg, PA 17110

Dear Ms. Bender:

As Director of the Humane Society of Cambria County, I would like to thank you, the Bureau, and Governor Rendell for your careful consideration of the proposed changes to the Pennsylvania Dog Law Regulations. As we have all realized, changes are needed to address and prevent inhumane kennel conditions and to facilitate enforcement. I applaud the efforts of all who are involved in this important task and my hope is that it will result in a better overall quality of life for the dogs in the Commonwealth.

I know that the main impetus behind these proposed changes came from the large number of puppy mill operations in our state but, I know that they will also have a side benefit of controlling some smaller operations that are becoming pervasive and will certainly grow into a bigger problem for all of us striving to do the right thing for the animals for which we are responsible. I am hoping, in particular, that the sections relating to "temporary homes" are not diluted or softened in the final version of the regulations. Our shelter and the dogs in our community have been adversely affected by the burgeoning numbers of pseudo "rescues", so-called "foster homes", etc. that fly under the radar and go unlicensed, unregulated, and are not inspected which many times result in horrendous conditions for the animals housed there. Our shelter has often become home to these animals after they are already compromised by the conditions they were subjected to in these "temporary homes".

My only other concern is with Sections 23.6, 25.1 and 25.4 as they relate to the licensing of dogs 3 months of age and older "before" being released from the shelter. I realize that this has always been a part of 25.5 but it has never been workable considering the restraints put on us by the County Treasurers and it seems to conflict with Article II of Dog Law under "Issuance of Dog Licenses" which I excerpt here:

(3) The county treasurer may authorize other agents within the county to process dog license certificates and to issue dog license certificates and tags. At least half of the agents appointed in each county shall have hours of operation after 5 p.m. at least one weekday and shall be open at

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 REVIEW COMMISSION

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least one day of each weekend. Agents who have been appointed by their respective county treasurers under this paragraph shall meet bonding requirements as their respective county treasurers may require.

Our shelter has always licensed dogs that are residing or will reside in Cambria County before they leave the shelter. However, we also adopt dogs to out of county residents and we do not have at our disposal any other counties' dog licenses to sell. According to our insurer, our bond is specific to the county in which we sell licenses. We are, at present, not covered to handle money as an agent outside of our county and it would be cost prohibitive if we were required to purchase separate bonding for out of county licenses of which we sell a limited number. Our Treasurer's office has made objection to us selling an out of county resident a license and then suggesting they transfer it to their county. Also, the requirement that license applications and fees be returned to the County Treasurer's office with 5 working days of the sale is burdensome and not workable. The County Treasurer's office accepts all licenses sold the previous month by the 10th day of the following month in bulk and will not accept partial sheets of licenses. I am enclosing a copy of Cambria County's Treasurer's directive to us concerning the sale of licenses. Either the proposed regulations need amended in some way to coincide with our ability to sell licenses or the current constraints put on us by our County Treasurers must be addressed. At any rate, shelters are only reimbursed \$1.00 for each license sold and never make a profit because we must first purchase a bond, pay for postage or mileage expenses to drive to the court house for license returns, pay employees time for writing and issuing of the license and for the record keeping attendant to the sale of the licenses. We have taken on that responsibility nonetheless because we think it is important that dogs in the Commonwealth are identified and more easily returned to their owners if lost.

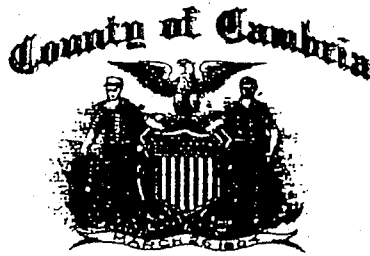
Again, please accept my thanks for your involvement in this important task.

Sincerely,



D. Black
Executive Director
Encl

KEVIN J. PERSIO
SOLICITOR



LISA M. KOZOROSKY
FIRST DEPUTY

BARBARA J. KLINE
Treasurer

Courthouse
200 S. Center Street
Ebensburg, PA 15931-1947

PRINT AND MAKE SURE NAME, ADDRESS, *MUNICIPALITY
(TOWNSHIP/BOROUGH), AND PHONE NUMBER ARE COMPLETE AND LEGIBLE (FOR
COMPUTER PURPOSES)

*APPLICANT MUST RESIDE IN CAMBRIA COUNTY ---SEE ATTACHED
MUNICIPALITY LIST--PLEASE REFER TO

APPLICANT FOR SENIOR LICENSE MUST BE 65 YEARS AT TIME OF PURCHASE

KEEP IN PAGES OF FOUR/RETURN TREASURER & AGRICULTURE COPIES

IF ALL FOUR LICENSES ON A SHEET ARE NOT SOLD BY THE 25TH OF EACH
MONTH; RETAIN THE PAGE AND MONEY FOR ISSUED LICENSES FOR THE
FOLLOWING MONTH'S RETURNS

KEEP IN NUMERICAL ORDER

SEPARATE REGULAR LICENSES FROM SENIOR LICENSES

NUMBER APPLICATIONS--TOP OF APPLICATION & RETURN WITH LICENSES SOLD

LIST ON "OTHER" LINE THE SEX/COST OF LICENSE (OPTIONAL)

DO NOT LICENSE ANY WOLF/WOLF MIX-- SEE ATTACHED MEMO

DO NOT ALTER LICENSE IN ANY WAY

YOUR FEE IS \$1.00 OVER THE COST OF THE LICENSES

Do not "stockpile" your license supply as our allocation is limited!!