

2559

RECEIVED

January 25, 2007

2007 FEB -5 PM 1:45

INDEPENDENT REGULATORY
REVIEW COMMISSION

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

Dear Ms. Bender:

My name is Tara Hartman and I live in the Pocono Mountains of Pennsylvania. I am a second-generation show dog breeder and exhibitor of Miniature Dachshunds. We are a small, family-oriented show kennel striving to breed Dachshunds to meet the AKC Breed Standard set forth by the Dachshund Club of America. We do not do this as a business, it is purely a hobby that my family can all participate and enjoy the results of their efforts when we attain American Kennel Club Championship on one of our dogs. I am very active in the improvement of pure-breed dogs, as I am a member of the Dachshund Club of America, the National Miniature Dachshund Club, and our local Pocono Mountain Kennel Club.

I would like to address the proposed amendments to the Pennsylvania dog law regulations that occurred on December 16, 2006. I certainly do agree that there are no doubt inhumane kennel conditions existing in Pennsylvania, as in other states, and they should be regulated more strictly and should not be tolerated. Such programs as Dateline have even documented this, when they have gone undercover at puppy mill kennels. However, I do not believe that many of the proposed regulations would necessarily be beneficial to regulating kennel conditions.

The first problem is that conscientious and quality oriented breeders and dogs owners would be unable to comply with the rigid commercial kennel standards as outlined in the proposed amendments. These breeders and owners not only already maintain their dogs in their own residential premises and abide by the Pennsylvania Dog Laws, but they already provide care and conditions far above those proposed by the new amendments. A small, quality oriented show breeder, like myself, having to become licensed, would create an undue hardship and financial burden.

Secondly, the recordkeeping requirements in regard to the exercising, cleaning, and the general maintain of a kennel are overly burdensome. I believe it would be impossible to verify the accuracy of the recordkeeping unless something gross and inhumane were to happen, in which case the authorities would then realize the inaccuracy of the books. And at that rate, the gross and inhumane circumstance is already in violation of the current regulation. It just seems that this amendment would be pointless. If the current regulations were to be enforced now, there quite possibly would have no use for this currently proposed regulation.

Additionally, the proposal regarding the social interaction of dogs of different sizes is not only absurd, but against basic socialization and training practices. For example, it would be like proposing that there should be no social interaction between a 10 year old Girl Scout and a 16 year old Honor Roll student, even though the 16 year old could be serving as a role model to the 10 year old. I do agree that the different sizes of dogs should be monitored, but see no practical reason why they should be able to play and live together in a controlled environment. Again, I believe it goes back to the enforcing of current regulations and repeated problems with certain individuals and kennels.

Most small show breeders do not have the financial ability of renovating or even rebuilding their current kennel facilities, ones that are currently in compliance with state/federal regulations and subject to inspections. The arbitrary, strict engineering standards that are proposed for kennels have no scientific basis to back it up.

My thoughts above are just a small sample of the problems with the proposed amendments of the December 16, 2006 meeting. The Pennsylvania Federation of Dog Clubs, of which my local kennel club is a member of, has more detailed comments regarding the Dog Law Proposed Amendments.

The Bureau of Dog Law Enforcement has conceded that its current regulations have not been adequately enforced. If, after making a strong stance on enforcing the current regulations, the Bureau finds it is still unable to prevent inhumane treatment of dogs because of specific ineffectiveness of current regulations, then those specific problems should be addressed and changes proposed based on them. The Pennsylvania Dog Law Regulations does not need to be haphazardly "fixed" by proposing new amendments, blanketing everyone in contact with dogs. It needs to specifically target the problem areas, most often occurring in puppy mill type conditions, not those of a small conscious, dog show breeder.

Respectfully,

A handwritten signature in black ink that reads "Tara Hartman". The signature is written in a cursive style with a long horizontal flourish extending to the right.

Tara Hartman
Tarlyn Miniature Dachshunds