

2559

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 Regina Vesco, I live in a suburb of Detroit, Michigan. I am an exhibitor of purebred dogs and have been for over 30 years. My hobby over the years has led to traveling to several states and visiting small communities all over the country, in my travels I, along with hundreds of thousands of other dog show enthusiasts and breeders showcasing their accomplishments have contributed to countless cities local and out of state economies. The money I spend at venues and at local merchants along the way and my hundreds of thousands of dog fanciers is what makes YOUR communities tic. I am writing this letter in support of my fellow dog fanciers in the Pennsylvania area, as a member of the purebred dog community and an avid exhibitor. I make it a point to take note of unreasonable dog legislation when it crops up around the country and to send a letter of support for the people of that region to legislators.

I do this because of the radical movement of "animal rights activists" and the danger that they are to ALL persons, pet owners or not.

While I know it is difficult at times to motivate people, dog fanciers when confronted by unreasonable legislation will band together, as a group that spans over this entire country we far outnumber the people who push these types of laws. Louisville Kentucky just recently passed far reaching and unreasonable legislation and the community will suffer as fanciers who travel hundreds of miles to go to dog show venues will not stay in that city and support the local economy. You need to ask yourself who and what is more important to your city.

I'd like to comment on the proposed amendments to the Pennsylvania dog law regulations issued on December 16, 2006. I believe and agree 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 we take care of our dogs. We adhere to a high standard and a code of ethics.
- * The obligations of owners of "temporary housing" which are made subject to inspection by the proposal are not enumerated or limited.
- * There is no scientific or accepted husbandry basis for the amended space and exercise requirements.
- * The regulations will require wholesale renovation, if not rebuilding, of many kennels already built in compliance with current federal and/or state standards. There is no scientific foundation for the arbitrary, rigid engineering standards specified.
- * Smaller breeders and dog owners who maintain their dogs (such as myself) 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

RECEIVED
2007 JAN 25 AM 9:11
INDEPENDENT
REVIEW

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.

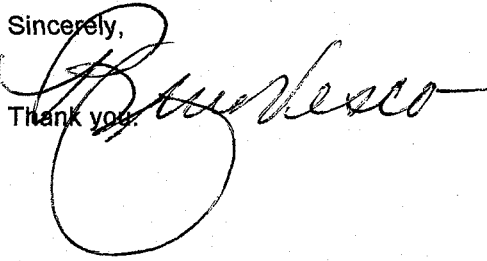
* The proposals pertaining to housing and social interaction of dogs of different sizes are contrary to good husbandry, socialization and training practices.

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,

Thank you.

A handwritten signature in cursive script, appearing to read "J. Russo", written over the typed name "J. Russo". The signature is written in black ink and is somewhat stylized.