

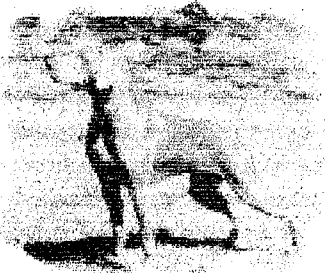
2559

Marthena Scollon  
P.O. Box 429  
Clearfield, Pa. 16830

RECEIVED

2007 FEB -8 AM 11:12

INDEPENDENT REGULATORY  
REVIEW COMMISSION



January 28, 2007

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

Dear Ms. Bender:

Upon retirement, I recently returned to the county of my family's origin. I spent most of my professional career living and working in one of the most diverse and historical communities in the City of Philadelphia. It is a pleasure to be back in the "Pennsylvania Wilds".

I grew up with show dogs, Boston Terriers and Bulldogs and members of my family have had various breeds. I have exhibited and enjoyed my own dogs as a hobby since the late 1960's.

In the late '60's, those of us who were bound by an employment residency law and exhibiting our dogs as a hobby and for pleasure found that we were in violation of the Philadelphia Code. We also found that the State Dog Law was in need of updating.

It is with a great deal of satisfaction to learn of the recent closing of a kennel in Lancaster County was successful only due to the fact that the updated law worked. Now, I am informed that the successful law is to be revised so, it seems to me, that it will not work.

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 and that if the wardens are given proper support, the Dog Law now in place would be most effective. The proposed regulatory changes are Not necessary and perhaps are only introduced to confuse the issues and thus, make the current Law unenforceable.

As I read through the proposed revisions to the Pennsylvania State Dog Law, I was reminded that many times in my career when we attempted to make rules very specific, they only were punitive to those already within the law and the others would

find a way around the specific. The language of the revisions of the proposed dog law is ambiguous and will do just that. The revisions reflect a blatant lack of knowledge of dog husbandry and dog behavior as well as the lack of knowledge of breeds and breed requirements.

The proposed regulatory changes appear to be designed to be punitive to the very support that is needed from those participating in the sport of dogs who know good condition, good veterinary care, good behavior training and characteristics, proper kenneling, exercise techniques, etc. or their dogs are NOT competitive. We are a valuable resource to you and these proposed changes are offensive and punitive to us.

I also find the detailed "clarifications" disrespectful to the carefully selected, trained, tested, Dog Wardens whom, to the best of my knowledge, conduct themselves in a very professional conscientious manner. They are demeaned to measuring the length of a dog from the tip of its nose to the tip of the tail (with or without hair?) and its environment, rather than being able to make a experienced professionally trained judgment call.

Following are a few specific examples of the problems I see with the proposals: However each proposal is ambiguous and should have exceptions for different breeds or situations which would be very cumbersome.

#### Kennel staff:

I see no place in the regulations that states how much nor the training of the staff is required per size of the kennel. I have learned that some boarding kennels here have no one on the premises for the better part of the day as the owners have full time jobs elsewhere. If the wardens had more time and help, they would be able to rectify this matter.

#### Cement runs:

Cement runs only may be very easy to keep sanitized, however, a breed like mine when on such surface all the time results in damaged joints and feet. This has the same effect on the larger breeds that are used for the military, police work, tracking, search and rescue and service dogs. A dog with damaged shoulder and hip joints and poor feet can not work.

#### Twenty-six dog limit:

Many times those of us with dogs in competition will get together with others at someone's home, garage, barn, field, farm, pond, etc. to practice for an upcoming event. I have also attended picnics and swim parties where we took the dogs, had a picnic and practiced and played games with the dogs. For the most part the dogs do the swimming in someone's pond or pool. Water races are fun for all and the young dogs learn to swim. You need a kennel license to host such an event?

#### Dangerous Dogs:

Dangerous dogs. No one knows how dangerous pit bulls running in the streets of Philadelphia are unless you have lived and worked in that environment as I have. And those who have them would not be able to fill out an application to register one nor would they care. The dog is probably stolen anyway. Many elderly and their pets are imprisoned in their own homes in Philadelphia because of these animals. This situation has spread to other areas of the state. The only way to curb this problem is with teams of undercover agents who can ferret out the hiding places, rescue the

animals and see that they are properly euthanized. It is my understanding that the sources for acquiring bait to teach these dogs to fight and kill is from shelters and breeders throughout the state.

Known abusers:

It is known that abusers such as you found in Lancaster County, abuse their spouses and children in the same way. And if provisions are not made to track and watch these individuals, it is a matter of time until they set up shop again perhaps with a different species or a different name.

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.

Recommendations:

Personally, I feel, we need to put our efforts toward programs to educate the public about the needs of a pet in their home and keep these animals from being bought and dropped at shelters and decrease the demand of the pet market and protect our children. Children need to be protected from seeing that pet that they were bought and learned to love and cuddle until it grew up being abused, turned out, dropped at a shelter or a slaughter house because adults made the wrong choice and given the wrong information about a breed or species. Those children are probably also told, "If you don't behave, that is what I will do with you too."

Further, I feel that anyone who has a kennel license should be required to work an proportionate number of hours at a shelter.

Kennels should be inspected once a month, at least. Internet sites need to be investigated. Our wardens need help and support and good supervision. Where do we find that help?

Perhaps an intern program would be beneficial and would provide training and employment to many who have a background in animal husbandry. Many of our young people here in Pennsylvania have grown up on the family farm. They are finding that those farms can not provide the income they need. Is this a place that a young 4-H'er can look for a career? Are the wardens doing programs in the schools? Or is there an educational program developed for the schools? Developers are buying the farms and these children are being displaced. Let's give them an opportunity to be trained as interns and use their backgrounds in animal husbandry.

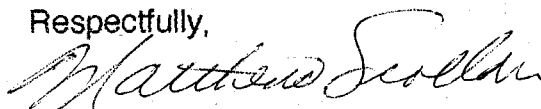
The proposed revisions be withdrawn.

An appropriate experienced advisory committee as outlined in the current law be reconvened and required to meet on a monthly basis with the governor.

This matter is very dear to me too. I love this state. I love my dogs. And I love my sport and hobby. Our dogs in all their dimensions are and have been historically a great asset to our society and well being.

Thank you for your kind consideration in this matter and for the great job you are doing.

Respectfully,



Marthena Scollon