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January 30, 2007

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

INDEPENDENT REGULATORY
REVIEW COMMISSION

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RECEIVED

Dear Ms. Bender,

Concerned dog owners and citizens of Pennsylvania have recently contacted the American Dog Breeders Association regarding rules and regulations that are proposed for kennel owners in your state.

We are respectfully writing to you on their behalf.

The American Dog Breeders Association Inc. (ADBA), an all breed registry, was established in 1909 to promote the study, breeding, exhibiting, and advancement of purebred dogs. The American Dog Breeders Association supports the adoption of reasonable, enforceable, non-discriminatory laws to govern the ownership and care of dogs.

The American Dog Breeders Association Inc. (ADBA), which represent the interests of more than three thousand dog owners/breeders across Pennsylvania, strongly oppose the overly restrictive rules and regulations that are proposed for kennel owners in your state. The enforcement of regulations such as these will effectively serve to shut down, or severely curtail the activities of the concerned, caring, and law-abiding breeders in Pennsylvania.

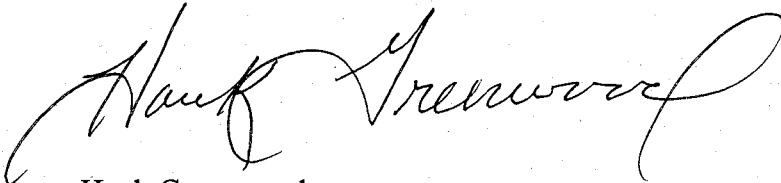
While we support efforts to reduce or eliminate substandard kennels, we are concerned that these overly burdensome and restrictive regulations will have severe unforeseen consequences. These unforeseen consequences include a reduced number of breeders willing to deal with the numerous administrative burdens that will result because of this proposal. This shortage of puppies will result in higher prices and a more lucrative opportunity for substandard kennels, imports and other puppies that are raised in less than acceptable conditions. Many of those who choose to operate in the shadows to fill this shortage will find the rewards are well worth the risk.

Additionally, there are 226 conformation events alone listed for 2007 in PA. Many are large and prestigious, with long histories (such as the Kennel Club of Philadelphia, Bucks and Trenton, Montgomery County and American Spaniel Club). Eliminating the breeding and showing activities of the very people who give their time and energy to stage these events will result in the loss of millions of dollars to the communities that host these events. There will also be an economic loss to those retailers who provide essential services and supplies to the numerous caring show and professional breeders in your state.

Finally, as written, the proposal provides zero incentives (except punishment avoidance) for breeders who adhere to the regulations. It is all stick and no carrot. If your true intent is to enhance the health, quality and welfare of the dogs bred in Pennsylvania, then the educational needs of the breeders must be addressed. Anyone can pass an inspection but education is the key to modified behavior.

We urge you to reconsider this matter and withdraw the proposed amendments to the Pennsylvania dog law regulations.

Yours truly,

A handwritten signature in cursive script, reading "Hank Greenwood". The signature is written in dark ink and is positioned above the typed name and title.

Hank Greenwood
Vice President / Chairman of the Board
American Dog Breeders Association Inc.
Charter Member: United State Canine Registries