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Bureau of Dog Law Enforcement
PA Dept of Agriculture
Mary Bender
2301 North Cameron Street
Harrisburg, PA 17110-9408

Dear Ms. Bender,

I am writing in opposition to the proposal of Dog Law Act 225 which was issued on December 16, 2006. I am in complete agreement that substandard kennel conditions exist in Pennsylvania and should not be permitted. Many of the proposed regulatory changes are impractical to K1 kennel operators, like myself.

My kennel was custom built to comply with the Department of Agriculture's Dog Law Enforcement standards that were based on **USDA** standards. All of my dogs are our pets, and are house dogs. Due to the fact that I average 5 litters of pups a year, which in some years, has put the number of accumulative dogs on my premises, above 27 in a year. I am required to hold a kennel license. We did construct an outdoor kennel, which is rarely used, just to stay in compliance with the law. Understanding that in fact, the majority of the day, my dogs are in the house, sleeping on a couch or chair, like many pet owners.

Just a few highlights from the proposal that are absurd to myself are:

21.21 Housing

c. Adequate drains or gutters, or both, shall be provided.

My response:

Why isn't the required stone, which provides drainage enough? Gutters and drains would only allow water to accumulate, attracting insects.

C. Adult dogs shall be segregated by sex.

My response:

If I put my two male (studs) together when a female is in heat, they surely would fight. Also, I have two dominant females that cannot be left alone together.

d. Puppies not born in the receiving kennel shall be quarantined for 14 days.

My response:

So if I bought a puppy, brought in into my home, I would have to keep my adults away from it for two weeks? How would I accommodate that except for keeping my adults or the pup crated the majority of their day? How many pet owners bring home a new pup and quarantine it for 2 weeks from their other pets?

21.23 Space

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(c) The exercise area must be equipped in a manner to allow dogs to be exercised even during inclement weather and to protect the dogs from becoming wet, matted, or muddy.

My response:

My exercise area is a fenced area, **22,500 square feet**. This area is not my back yard. It was built around my outdoor kennel. This area does house a sheltered area where my dogs can avoid the weather, **if they choose**. How beneficial would it be to my dogs to cover or stone the **whole area**? How many pet owners cover and stone their yard? On the same note, why would an exercise area be required to be stoned? Dogs are surely not benefiting by running on stones.

Addressing the use of tarps for shelter, when outdoors. I have two shelters built in my outdoor kennel, that are constructed just like the canopy we use on our pool deck in the summer to keep give our children the option to be in the shade. The new law states that tarps are not considered permanent and cannot be used. Stating that they must be flawless from holes or tears would make sense. Not allowing them to be used does not. My canopies are up year round for my dogs, and replaced as needed.

Addressing the documentation of everything I do for my dogs daily, like washing their dishes, exercising them, cleaning their houses, etc. is absurd and would take my time away from their social needs. I do not document these daily chores done for my children.

Addressing that pet store owners and nonprofit shelters are exempt from the space and exercising areas of this proposal is baffling to me as well. A younger pup being housed in a 3x3 crate with no exercise area is just wrong. They need exercise to help them grow more than a dog that is older. A no kill shelter should be made to comply along side any of the PA kennels, as they are housing dogs as well sometimes for the same purpose. I do have a rescue dog occasionally.

Some suggestions to future proposals. I would like to see more specific health care records required for dogs. Currently, only rabies shot vaccinations are required. Documenting that their dishes, houses and bedding are washed, **but not ever required to bath the dog**. Makes no sense to me. Also, what about some more stringent laws for breeding ill and older dogs.

Again, I am clearly stating that this proposal has many flaws that are not beneficial to dogs. **USDA** standards should be required, and substandard kennels should be monitored by more frequent visits by the designated Dog Law Enforcement Officer to insure that USDA standards are met.

Cynthia K. Anderson