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

RECEIVED
2007 FEB -1 AM 9:11
INDEPENDENT REGULATOR
PENSION COMMISSION

Dear Ms. Bender:

My name is Derek Gibson and my family has been raising Shih-Tzu's in our home for almost 30 years at 5566 Cedar St in Williamson, Pa 17270. There are four generation's of Gibson's that care for our dogs in our home and we would like to be able to continue to do this into the future. We feel these new regulations are clearly written by animal rights activist that are determined to destroy families that have spent their lives raising purebred dogs, without regard for the dogs or the people that have or want our puppies. In the new regulation and many articles being published the claim is that there is no impact to the general public, the sad truth is this is the group that will be impacted the most. If these new regulations are put into place a purebred dog from PA with cost three to four times the current cost if you can even get one. People will then be forced to surrounding states, pet shops, or the mid-west puppy mills. Let's be real if you let the Animal Liberation Front or other animal rights groups write the regulations for the beef or poultry industry in PA do you think they would stay in business or that the general public could afford to eat PA beef or poultry? Am I saying that dogs serve the same purpose as beef and poultry, only from the aspect that we should have the choice if we want a purebred dog or to be able to eat meat, they fulfill very different needs and require different care. In many ways our family has never looked at our dogs as a business, it has been our policy to keep, love and care for our dogs until the end of their lives, not until we stop breeding them. Now I am placing older adults with families and putting down some that I would have continued to care for if it were not for these regulations and the threat of SWAT. SWAT scares me not because I am not compliant to regulations or mistreating my dogs, but anytime a team of lawyers are sent to your home for the sole purpose of finding things wrong with you it's not going to be a good day. In addition after you make the paper as a SWAT headline for possible violations, you get the comments about lose of teeth or sore feet, ECT. Without regard for age or care you may be providing not to mention these are not covered in the current regulations to my knowledge. This whole campaign has been about politics, deception and emotion. It is supposed to wipeout puppy mills, but in truth will wipeout everyone but the largest of commercial breeders. It seems to me that if the new regulations were designed to stop puppy mills then a puppy mill would have been clearly defined which it was not. If you truly want to improve the conditions of dogs in Pa work with the breeders, don't destroy them. Give us state low interest loans to make improvements to our homes that will truly better the quality of the life of our dogs, not the changes that are outlined in this confusing, impossible legislation.

I believe 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.

- * 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. In addition it is insinuated in newspapers that cages cause sore feet that constitutes cruelty. If you want to outlaw cages say it don't request double the space and still cry cruelty. It is required to keep the kennel 50 - 85 degrees F which is fine but then we will be forced to put our dogs outside in freezing temperatures, rain, snow and excessive heat, not to mention that I have to stay out there with them to supervise. It would be nice to just be able to sit outside all day and watch my dogs play weather permitting, but someone has to do all the work inside that is already required seven days a week. Cleaning and sanitizing the grounds after every dog plays are another

unnecessary and impossible requirement.

* 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. One of the worst of these is the inches of the different stones in the play areas, it would be impossible to maintain this segregation of layers.

* Smaller breeders and dog owners who maintain their dogs 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 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,



Derek Gibson

5566 Cedar St

Williamson, Pa 17270