

FEB 26 REC'D

INDEPENDENT REGULATORY
REVIEW COMMISSION

Dog Law Advisory Board:
Mary Bender, Director
Pennsylvania Bureau of Dog Law Enforcement
2301 North Cameron Street
Harrisburg, Pennsylvania 17110

I am writing on behalf of the Pennsylvania Beagle Gundog Association to comment and provide feedback on the proposed amendments to the Dog Law Regulations Act 225 issued on December 16, 2006. Please see the attached which describes the PBGA.

The PBGA is dedicated to support and promote the Beagle for which the breed was originally developed and to support the sport of Beagling which is intended to improve the breed through competition. The following is an excerpt from the American Kennel Club's website providing competition history:

Then in 1888, the National Beagle Club was formed and held its first trial. From that time on field trials carrying championship points sprang up rapidly all over the United States, and classes developed for hounds under 13 inches and 13-15 inches.

The PBGA would suggest and comment on the proposed law changes which the Bureau of Dog Law Enforcements developing which would impact the members of our association negatively. Please see the below:

- The PBGA supports the suggestion of removing enforcement from the local district magistrate to the Commonwealth of Pennsylvania.
- Many of the proposed changes are impractical and burdensome. These changes will not likely improve the conditions in licensed kennels. The proposed regulations will require a substantial increase in manpower with many hours dedicated to filling out bureaucratic reports or recordkeeping.
- Several areas will be difficult to enforce and the proposed regulations are very general to not include definitions to terms such as:
 - o 20 minute exercise requirements,
 - o Quarantine
 - o A number of standards are poorly worded.

- The 20 minutes daily exercise requirement is not practical for our small hound kennel owners. A "20 minute" walk on a leash has a totally different means of exercise than our hounds are accustomed to. The beagle is designed to hunt and trail rabbits from scent. Four hounds running a rabbit after a 6 hour day of hunting far exceeds the 20 minute exercise requirement suggested. A 20 minute rabbit chase is a more extensive method of exercise than the "20 minute" walks on a leash down the street.
- The Beagle as well as other sporting dogs (Pointers, Retrievers, Spaniels, Fox Hounds, Coonhounds, Bassett Hounds) just to name a few, is bred for a different purpose rather than a house pet. These dogs are sporting/ hunting dogs. Different breeds are not considered in these proposals. The AKC website provides information specifying the purpose of each breed.
- The laws and regulations are not based from scientific research rather they are based on emotions. Research was conducted to develop the current kennel size parameters that have been established which is distinguished by the size of the dog.
- Acclimation to weather: Due to dog developing different coats different times of year, it is actually more inhumane to bring a dog in and out of the house as their bodies and coats become accustomed to the temperature in which they are living. Constant change in living temperature is not healthy for a dog.
- Seizure of kenneled hounds is at the mercy of the shelter at which the dog in dropped off. If dogs have been removed without good reason, no cost should be associated to the owner.

Again, many of the dog law proposals are unrealistic and will be extremely difficult for our membership to abide by. Please take our feedback into consideration in the development of updates to the dog laws.

Thank you,



Jared Shade, President

Pennsylvania Beagle Gundog Association (PBGA Inc.)

Eastern Regional Vice-President: Mark Malloy
Western Regional Vice-President, Gary DeFoor
Secretary; Todd Seitz
Treasurer: David Sharer
Director of Communications: Joshua Herring

Pennsylvania Beagle Gundog Association (PBGA)

**Breakneck-Carlisle-Central-Conemaugh Valley-Eldred-Elizabethtown-Indiana County
-Jacobus-Lebanon-Lycoming County-Lykens Valley-Mason Dixon-Monroe
Northern Lancaster-Oil Creek-Pucketos-Rainbow-Rayburn-Shamokin-Sharpville
Susquehanna Valley-Towanda-Tunkhannock-Webster-West Branch-York & Adams**

- Consisting of 26 member beagle clubs all across the state of Pennsylvania and growing strong—with at least two more member clubs currently on probation, applying for admission to the PBGA.
- Consisting of 2,400 beaglers and hunters.
- Professional quality webpage maintained on a regular (daily) basis:
www.pabeagle.org
- Nearly 100 field trials held across the state (average entry for qualifiers is 25-30 at each event. This does not include AKC Licensed Trials. All of our clubs host at least one licensed trial per year, some host two or three per year. Average entries for qualifiers range from 25-30 entries per trial.
- Two championship trials (one All Age and one Derby) held annually, participation in 2005 consisted of over 100 entries representing 7 different states.
- Annual banquet and award ceremony held each January.
- Three PBGA meetings held per year with over 50 members in attendance at these meetings.
- Annual published directory (300 published and distributed each year).
- Maintain an active form of communication with our club delegates and field trial secretaries via regular mailings and email communications.
- Strong leadership with an executive board consisting of a President, 2 Vice Presidents, Secretary, Treasurer, 4 Directors, and a Director of Communications and Publicity.
- Regularly write and submit articles to the national beagling magazines about the association and our progress.
- Publicize our field trials, promoting our dog food sponsors, with an ad prior to the trial, and encourage pictures and results to be published after the trials.
- Involvement in the PBGA related events is not strictly limited to PBGA clubs; as a result we have active participation from beaglers in all nearby states.
- Consistency award (to encourage and promote active beagling at all PBGA related events) offered to hounds in each class at both the All-Age and Derby levels, which rivals (in prizes) any national award currently offered in beagling. We have over 250 beaglers competing in this year-long competition.
- PBGA clubs having voting rights in the North East Beagle Gundog Federation, which also includes the Iriquois Beagle Gundog Association (NY) and the New England Hunting Beagle Association. As a federation we have a vote on the AKC Beagle Advisory Committee.
- For further information on the PBGA, contact Jared Shade, jaredshade@tds.net or visit us online at www.pabeagle.org