

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

February 2, 2007

RE: Comments on proposed Dog Law regulations

Dear Ms. Bender,

As a concerned citizen of the state of Pennsylvania, I respectfully submit this comment on the proposed changes to the Dog Law regulations.

First, I would like to commend the Department of Agriculture and the Bureau of Dog Law Enforcement for proposing amendments to the Dog Law Regulations to improve conditions for dogs housed and bred in commercial breeding operations in Pennsylvania. **It should also be noted that the proposed changes to the regulations do not bring hobby breeders under the Act. The same people who were exempt from the former regulations (i.e. hobby breeders who raise, breed, move, sell, etc. fewer than 26 dogs per year), will continue to be exempt under the revised regulations.**

Furthermore, I fully support the comments submitted by the American Society for the Prevention of Cruelty to Animals (ASPCA) on behalf of its members, and incorporate them herein by reference. Specifically, I strongly support the following:

1. The penalties in § 21.4(1)(iii) for "failure of an individual to comply with licensure provisions" should be increased from \$25 to \$300 per violation to \$25 to \$300 *per day of violation*.
2. The Secretary should be mandating to file suit to enjoin operation of unlicensed kennels where the kennel is not in compliance with the standards in the regulations and is unable to qualify for a license.
3. I commend the Department of Agriculture and the Bureau of Dog Law Enforcement for doubling the required cage size. This is perhaps the most important change that can be made to improve the quality of life for dogs in commercial breeding facilities in Pennsylvania. This provision should remain in the regulations regardless of opposition from breeders. This section should be further strengthened by adding a provision stating that where more than one dog is housed in a primary enclosure, the primary enclosure must provide adequate space for all dogs. For instance, if the enclosure houses two dogs, it must provide double the cage space that would be required for a single dog. If it houses three dogs, it must provide three times the cage space, etc.
4. I also commend the Department of Agriculture and Bureau of Dog Law Enforcement for including a provision that requires the dog wardens to visually observe the physical condition

Thank You
for your prompt
Attention!
(spell?)

of each dog. However, the provisions regarding orders of veterinary care should be strengthened to state that the owner must provide "proof of *current and proper* veterinary care for the dog." This provision should also be amended to include excessive matting and excessively long toenails as indications of lack of proper veterinary care. Inadequate grooming can lead to painful medical issues for dogs, including skin lesions from excessive matting and leg and joint injuries from failure to keep toenails appropriately trimmed. Moreover, the section should be amended to *require* dog wardens to order a veterinary check on dogs that exhibit signs of infection, contagious disease or parasite; or that appear to be in poor health where proof of current and proper veterinary care is not provided.

5. A new subsection should be added to § 21.30 clarifying the required training for dog wardens. Training in the following areas should be added into the regulations to expand upon the requirements set forth in 3 P.S. § 459-901:

1. State laws relating to dog licensing, control and owner responsibilities;
2. State and federal laws relating to animal care, cruelty and neglect;
3. State laws relating to dangerous dogs;
4. State and federal law relating to lack of arrest powers, proper use of search, seizure and warrants;
5. State and federal laws relating to pounds and shelters;
6. Basics of cruelty and neglect investigations for referral to appropriate authorities;
7. Report-writing and record-keeping;
8. Overview of the legal system, court structure and terminology;
9. Basics of interpreting animal behavior;
10. Identification of injury, disease, abuse and neglect in dogs;
11. Animal hoarders; and
12. Civil liability issues.

6. A new section should be added to the regulations mandating that the Department and dog wardens coordinate and work with law enforcement when applicable. It is imperative that the department work with law enforcement, and specifically Humane Society police officers, to ensure that both the cruelty laws and the Dog Law are adequately enforced.

7. A new section should be added to the regulations requiring that a licensee must have enough employees to carry out the level of husbandry practices and care required by the Act and its regulations. Additionally, the employees who provide for care and husbandry or handle animals should be supervised by an individual who has the knowledge, background, and experience in proper husbandry and care of dogs to supervise others. The licensee must be certain that the supervisor and other employees can perform to such standards.

8. Stacking primary enclosures on top of one another should be prohibited. Stacking cages creates an unnatural environment for the dogs. Additionally, it makes observation of the dogs more difficult and creates sanitation problems. Even with a tray or partition between

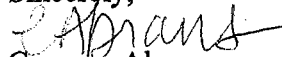
cages, it is likely that the partitions may overflow, causing feces, urine, food, water, and hair to fall onto the dogs located in the cages below.

9. The section on wire mesh flooring should be amended to make it at least as strict as the federal Animal Welfare Act, which requires that metal strand flooring be greater than one-eighth of an inch in diameter (9 gauge) or coated with a material such as plastic or fiberglass. Language should also be added requiring that all primary enclosures that have wire mesh flooring also have a resting board of sufficient size to allow each dog in the enclosure to lie in a full lateral recumbent position and be able to make normal postural adjustments. Resting boards are necessary to provide for the comfort of the dog and to allow the animal to have some time away from living on grated fencing. Providing resting boards will result in fewer foot lesions and other foot and leg injuries to the dogs. A solid resting surface that is impervious to moisture is also a more natural environment for the animal, provides a draft-free surface and enables the dog to retain its body heat. A dog feels most vulnerable when lying down, and forcing a dog to lie over an exposed area can contribute to anxiety. Humane standards and survival standards are separate, and creating an environment that merely allows for survival does not necessarily make such an environment humane.

10. Contrary to what the breeding industry states, the engineering standards specified in the proposed regulations do have a scientific foundation. The standards in the proposed regulations are more akin to acceptable husbandry practices. They will bring the engineering standards up to par with, if not above, those set forth in the Animal Welfare Act. Contrary to the hobby breeders' contention, the new regulations will not bring hobby breeders under the purview of the Dog Law. Only kennels that keep, harbor, board, shelter, sell, give away, or transfer *a cumulative total of 26 or more dogs* in one calendar year will be required to comply with the new regulations. As a result, true hobby breeders are still exempt from the law. Good husbandry practices dictate that anyone harboring a larger number of dogs (26 or more) should comply with certain engineering standards to ensure the health, safety, and well-being of the dogs. The Dog Law and its regulations are aimed at regulating larger and commercial breeding facilities. Therefore, the new regulations will not affect hobby breeders, contrary to what the breeding community suggests.

Once again, I commend the Department of Agriculture and the Bureau of Dog Law Enforcement for proposing regulations that will improve the conditions for dogs housed and bred in Pennsylvania's commercial kennels. The changes I have noted above will further ensure that such dogs are protected. Thank you for your time and consideration.

Sincerely,


Caranne Abrams

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

February 2, 2007

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Dear Ms. Bender,

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Furthermore, I fully support the comments submitted by the American Society for the Prevention of Cruelty to Animals (ASPCA) on behalf of its members, and incorporate them herein by reference. Specifically, I strongly support the following:

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Once again, I commend the Department of Agriculture and the Bureau of Dog Law Enforcement for proposing regulations that will improve the conditions for dogs housed and bred in Pennsylvania's commercial kennels. The changes I have noted above will further ensure that such dogs are protected. Thank you for your time and consideration.

Sincerely, Susie Hammond
P.O. Box 231
Chesapeake, Md 21915

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

January 31, 2007

Dear Ms. Bender,

As a kennel owner for a good number of years, I appreciate the fact that the bureau has helped to improve the dog laws. With regard to the proposed dog law changes Act 225 issued on December 16, 2006, I have a few serious concerns.

The proposed changes would require the kennel owner to record every time a water bowl or food pan is washed, every time the primary and secondary pen enclosures are cleaned, the feeding and watering dates and times, etc. These excessive and burdensome requirements will require a substantial increase in manpower with many hours dedicated to filling out written bureaucratic reports and divert the small business owner's time away from caring for their animals.

Kennels have been custom built to comply with the Department of Agriculture's Dog Law Enforcement standards that were based on USDA standards. The proposed changes of this section will require the demolition of licensed and inspected kennels and the rebuilding of entirely new dimensioned kennels. The average cost per kennel will be between \$30,000.00 and \$500,000.00 each.

The proposed changes make no sense for all kennel owners' dogs to be seized by the Dog Law Bureau based on the Governor's proposed new requirements for pen sized or quarantine regulations. Dog Law places the same dog into a humane society not required to have the proposed new standards. It is vital to have fair and uniform kennel requirements. In addition, small business owners are affected greatly and their due process rights in court are limited if the proposed changes adopted.

I sincerely urge that this proposal be rescinded.

Yours Sincerely,



Andrew Hoover
6471 Park Rd.
Orrstown, PA 17244

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

January 23, 2007

Dear Ms. Bender,

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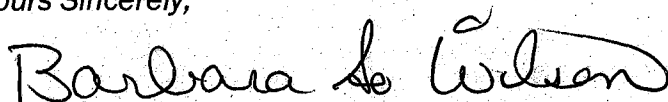
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I sincerely urge that this proposal be rescinded.

Yours Sincerely,



Goliath's Paw Doggie Daycare
4 Bainbridge St.
Marietta, PA 17547

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

January 22, 2007

Dear Ms. Bender,

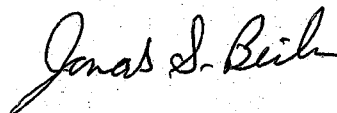
I am writing to comment on the proposed amendments to the Dog Law Regulations Act 225 issued on December 16, 2006. I personally think that many of the changes are impractical and burdensome, and will not improve the quality of life for dogs in kennels.

The proposed regulations will require a substantial increase in manpower with many hours dedicated to filling out bureaucratic reports or recordkeeping which the department already has.

Kennels have been custom built to comply with Pennsylvania Department of Agriculture's Dog Law Enforcement standards that were based on USDA Standards. The proposed changes of this section will require the demolition of Pennsylvania's licensed and inspected kennels and the rebuilding of entirely new dimensioned kennels. There is no scientific basis for the change; the average cost per kennel will be between \$30,000.00 and \$500,000.00 each.

The current proposed appears to be over idealistic in term of improving the welfare of dogs. I urge that this proposal be rescinded and an approach similar to the USDA standards be developed.

Yours truly,



Pequea Kennel
196 Blank Rd
Narvon, PA 17555

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

February 1, 2007

Dear Ms. Bender,

I am writing in response to the proposed amendments to the Dog Law Act 225 which was issued on December 16, 2006.

The current proposed regulation changes have appeared to be burdensome and beyond rulemaking. The proposals add completely new categories and definition to the existing laws. These changes must be addressed through the legislative process.

The proposals referencing housing and social interaction of dogs of different sizes are contrary to good husbandry, socializing and training practices. Furthermore, there is no scientific or accepted husbandry basis for the amended space and exercise requirements.

In addition, the proposed regulations call for the temperature of the kennel floor to be 50F° in the warm weather. Many kennels are air conditioned to a comfortable 70F°. A dog sleeping on a 50F° floor can develop hypothermia and become ill or die. For temperature, lighting, cleaning, exercise, housing, and veterinary care, the attending veterinarian should set forth and approve procedures specific for the kennel buildings and breeds of dogs.

The proposed changes above will require Pennsylvania's licensed and inspected kennels to be demolished and rebuilt. The average cost will be between \$30,000.00 and \$500,000.00 per kennel, if the proposed laws are adopted.

The current proposed appears to be over idealistic in term of improving the welfare of dogs. I urge that this proposal be rescinded and an approach similar to the USDA standards be developed.

Yours sincerely,

Lisa M Zychal
75 N Sheridan Rd
Newmanstown, PA 17073

Lisa M Zychal
HEALTHY PAWS INC
610-693-8222

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

February 1, 2007

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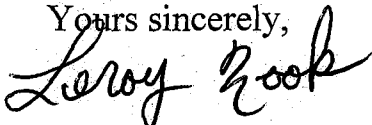
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The current proposed appears to be over idealistic in term of improving the welfare of dogs. I urge that this proposal be rescinded and an approach similar to the USDA standards be developed.

Yours sincerely,



Leroy Zook
97 Green Burr Gap rd
Rebersburg, PA 16872

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

Dear Ms. Bender:

As a dog owning voter, I want to go on record as opposing the **NEW** Pennsylvania Kennel Regulations.

My name is William E Weasner, Jr. and I live with my wife in the Kunkletown, PA area:

William and Jania Weasner
P.O Box 328
Kunkletown, PA 18058-0328

My wife and I work as teacher assistants for "special needs students" (not a highly paid position, but with certain non-monetary rewards). We leave our well-mannered dog at Trifecta Kennels every school day to avoid the psychological trauma (for the dog) of separation anxiety and to socialize the dog. He is eager to go to the kennel in the morning and eager to return to his/our home in the evening. The care and attention he gets at our local kennel (Trifecta Kennels) is excellent! He is taken out and allowed to run in a fenced "Dog Park" with his peers (his "Pack") under supervision everyday. As a result he returns home at ease and with a positive, friendly attitude toward other dogs and people. At some time in the future we may want to breed him as a non-commercial venture to form our own two or three dog "Pack" of very special dogs and companions. Moose is a loved member of our family.

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, 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. Correct enforcement of the existing laws would virtually eliminate all problem areas. If enforcement is under-financed, then increase the budget. It would be less expensive than the proposed changes.

Examples of problems with the proposal are the following:

* The proposals pertaining to housing and social interaction of dogs of different sizes are contrary to good husbandry, socialization and training practices. (The staff at Trifecta considers our dog to be one of the happiest most well-adjusted and mannerly dogs for whose care they are responsible. Because of the mixed size/breed socialization he receives, he gets along well with virtually all dogs.)

* 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. (I cannot afford to recreate a "mini" commercial standard kennel, but the care I provide far outstrips what a kennel could provide.)

* 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.

* There is no scientific or accepted husbandry basis for the amended space and exercise requirements. (Here, proof should be the motivating reason, not "emotion".)

* 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.**

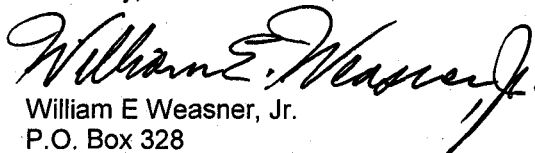
* The record keeping requirements with respect to exercise, cleaning, and other aspects of kennel management are excessively burdensome and serve no useful purpose, as it would be impossible to verify their accuracy in all but the most egregious circumstances. Such egregious circumstances already violate existing regulations. (Records can be, and are faked. Increasing the volume of records maintained does not improve their accuracy or effectiveness. The proposal would increase documentation costs without providing benefit.)

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. Correct enforcement of the existing laws is what is needed not additional poorly conceived laws.

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 with no basis in science or accepted canine husbandry practices. I urge that this proposal be withdrawn.

Sincerely,



William E Weasner, Jr.
P.O. Box 328
Kunkletown, PA 18058-0328

Cc: Senator Patrick M. Browne, Michael K. Hanna-Chairman Agriculture Affairs, Ms. Mary Bender-Bureau of Dog Law Enforcement, Mr. Mike Carroll-Legislator, Governor Edward G. Rendell

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

January 26, 2007

Dear Ms. Bender,

I am writing in response to the Dog Law Act 225 that was issued on December 16, 2006, of which I have several disagreements. The regulatory proposals in general are very difficult and costly to enforce, extremely onerous, and not feasible when put in to practice.

The new proposal only permits a licensed kennel to buy from another licensed kennel. This is fraud for the following reasons:

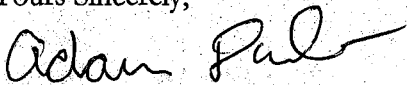
1. Unless the kennel has purchased, sold, or transferred more than 26 dogs in a calendar year to the individual, it is impossible for the kennel to know if the individual is required to have a Pennsylvania kennel license.
2. It is unlawful for the department to regulate and inspect kennels outside of Pennsylvania.
3. The Pennsylvania Department of Agriculture Dog Law Enforcement Bureau already requires the name, address, acquisition date, disposition date, type of sale, breed, sex, color, whelping date, and identification number be recorded for each and every dog sold, transferred, adopted, or given away. If the Department wishes to enforce the law, they already have all information needed.

The proposals referencing to housing and social interaction of dogs of different sizes are contrary to good husbandry, socializing and training practices. Moreover, there is no scientific or accepted husbandry basis for the amended space and exercise requirements.

The current proposal claims to be a general list of ideas to improve the breeding environment for dogs, which are neither substantiated by science nor attributed as accepted canine husbandry practices. A better idea would be for Pennsylvania to adopt USDA type standards.

I sincerely request that this proposal be withdrawn.

Yours Sincerely,



Adam Daub
1380 Pine Grove Road
Fredericksburg, PA 17026

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

January 31, 2007

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Yours Sincerely,



Doggie World Daycare Inc
858-62 N. 3rd St
Philadelphia, PA 19123

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

January 30, 2007

Dear Ms. Bender,

I am writing to express a few concerns that I have with regard to the proposed Dog Law Act 225, which was issued on December 16, 2006.

I appreciate that fact that the bureau has helped to improve the dog laws in the past several years. However, the current proposed regulation changes have appeared to be intentionally burdensome and go far beyond mere rulemaking.

The proposals add completely new categories and definition. These changes must be addressed through the legislative process.

The proposed changes require the kennel owner to record every time a water bowl or food pan is washed, every time the primary and secondary pen enclosures are cleaned, and the feeding and watering dates and times, etc. All these burdensome and excessive requirements will require a substantial increase in manpower with many hours dedicated to filling out written bureaucratic reports and divert the small business owner's time away from caring for their animals.

The Departments direction and intentions are neither attributed as accepted canine husbandry practices nor substantiated by science. The Department should base their changes on education to improve the industry. I request that this proposal be withdrawn.

Yours sincerely,



Kevin Stroup
PO Box 326
Kreamer, PA 17833

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

January 30, 2007

Dear Ms. Bender,

I am writing to express a few concerns that I have with regard to the proposed Dog Law Act 225, which was issued on December 16, 2006.

I appreciate that fact that the bureau has helped to improve the dog laws in the past several years. However, the current proposed regulation changes have appeared to be intentionally burdensome and go far beyond mere rulemaking.

The proposals add completely new categories and definition. These changes must be addressed through the legislative process.

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Yours sincerely,

Martha L. Stroup

Martha Stroup
PO Box 326
Kreamer, PA 17833

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

January 26, 2007

Dear Ms. Bender,

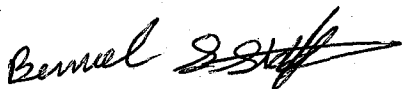
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Yours sincerely,



Benuel S. Stoltzfus
140 N. Birdell Road
Honey Brook, PA 19344

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

January 31, 2007

Dear Ms. Bender,

I am writing to express a few concerns that I have with regard to the proposed Dog Law Act 225, which was issued on December 16, 2006.

I appreciate that fact that the bureau has helped to improve the dog laws in the past several years. However, the current proposed regulation changes have appeared to be intentionally burdensome and go far beyond mere rulemaking.

The proposals add completely new categories and definition. These changes must be addressed through the legislative process.

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Yours sincerely,



The Kennel
1301 Red Mud Hollow Rd
Sewickley, PA 15143

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

January 30, 2007

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Yours sincerely,

Benjamin J. Fisher

Stormy Ridge Kennel
183 Field Ln
Centre Hall, PA 16828

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

January 31, 2007

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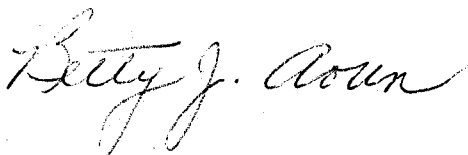
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Yours sincerely,



T. L. C. Pet Resort
1372 Pittsburgh Rd
Franklin, PA 16323

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

February 2, 2007

RE: Comments on proposed Dog Law regulations

Dear Ms. Bender,

As a concerned citizen of the state of Pennsylvania, I respectfully submit this comment on the proposed changes to the Dog Law regulations.

First, I would like to commend the Department of Agriculture and the Bureau of Dog Law Enforcement for proposing amendments to the Dog Law Regulations to improve conditions for dogs housed and bred in commercial breeding operations in Pennsylvania. **It should also be noted that the proposed changes to the regulations do not bring hobby breeders under the Act. The same people who were exempt from the former regulations (i.e. hobby breeders who raise, breed, move, sell, etc. fewer than 26 dogs per year), will continue to be exempt under the revised regulations.**

Furthermore, I fully support the comments submitted by the American Society for the Prevention of Cruelty to Animals (ASPCA) on behalf of its members, and incorporate them herein by reference. Specifically, I strongly support the following:

1. The penalties in § 21.4(1)(iii) for "failure of an individual to comply with licensure provisions" should be increased from \$25 to \$300 per violation to \$25 to \$300 *per day of violation*.
2. The Secretary should be mandating to file suit to enjoin operation of unlicensed kennels where the kennel is not in compliance with the standards in the regulations and is unable to qualify for a license.
3. I commend the Department of Agriculture and the Bureau of Dog Law Enforcement for doubling the required cage size. This is perhaps the most important change that can be made to improve the quality of life for dogs in commercial breeding facilities in Pennsylvania. This provision should remain in the regulations regardless of opposition from breeders. This section should be further strengthened by adding a provision stating that where more than one dog is housed in a primary enclosure, the primary enclosure must provide adequate space for all dogs. For instance, if the enclosure houses two dogs, it must provide double the cage space that would be required for a single dog. If it houses three dogs, it must provide three times the cage space, etc.

4. I also commend the Department of Agriculture and Bureau of Dog Law Enforcement for including a provision that requires the dog wardens to visually observe the physical condition of each dog. However, the provisions regarding orders of veterinary care should be strengthened to state that the owner must provide "proof of *current and proper* veterinary care for the dog." This provision should also be amended to include excessive matting and excessively long toenails as indications of lack of proper veterinary care. Inadequate grooming can lead to painful medical issues for dogs, including skin lesions from excessive matting and leg and joint injuries from failure to keep toenails appropriately trimmed. Moreover, the section should be amended to *require* dog wardens to order a veterinary check on dogs that exhibit signs of infection, contagious disease or parasite; or that appear to be in poor health where proof of current and proper veterinary care is not provided.

5. A new subsection should be added to § 21.30 clarifying the required training for dog wardens. Training in the following areas should be added into the regulations to expand upon the requirements set forth in 3 P.S. § 459-901:

1. State laws relating to dog licensing, control and owner responsibilities;
2. State and federal laws relating to animal care, cruelty and neglect;
3. State laws relating to dangerous dogs;
4. State and federal law relating to lack of arrest powers, proper use of search, seizure and warrants;
5. State and federal laws relating to pounds and shelters;
6. Basics of cruelty and neglect investigations for referral to appropriate authorities;
7. Report-writing and record-keeping;
8. Overview of the legal system, court structure and terminology;
9. Basics of interpreting animal behavior;
10. Identification of injury, disease, abuse and neglect in dogs;
11. Animal hoarders; and
12. Civil liability issues.

6. A new section should be added to the regulations mandating that the Department and dog wardens coordinate and work with law enforcement when applicable. It is imperative that the department work with law enforcement, and specifically Humane Society police officers, to ensure that both the cruelty laws and the Dog Law are adequately enforced.

7. A new section should be added to the regulations requiring that a licensee must have enough employees to carry out the level of husbandry practices and care required by the Act and its regulations. Additionally, the employees who provide for care and husbandry or handle animals should be supervised by an individual who has the knowledge, background, and experience in proper husbandry and care of dogs to supervise others. The licensee must be certain that the supervisor and other employees can perform to such standards.

8. Stacking primary enclosures on top of one another should be prohibited. Stacking cages creates an unnatural environment for the dogs. Additionally, it makes observation of the dogs more difficult and creates sanitation problems. Even with a tray or partition between cages, it is likely that the partitions may overflow, causing feces, urine, food, water, and hair to fall onto the dogs located in the cages below.

9. The section on wire mesh flooring should be amended to make it at least as strict as the federal Animal Welfare Act, which requires that metal strand flooring be greater than one-eighth of an inch in diameter (9 gauge) or coated with a material such as plastic or fiberglass. Language should also be added requiring that all primary enclosures that have wire mesh flooring also have a resting board of sufficient size to allow each dog in the enclosure to lie in a full lateral recumbent position and be able to make normal postural adjustments. Resting boards are necessary to provide for the comfort of the dog and to allow the animal to have some time away from living on grated fencing. Providing resting boards will result in fewer foot lesions and other foot and leg injuries to the dogs. A solid resting surface that is impervious to moisture is also a more natural environment for the animal, provides a draft-free surface and enables the dog to retain its body heat. A dog feels most vulnerable when lying down, and forcing a dog to lie over an exposed area can contribute to anxiety. Humane standards and survival standards are separate, and creating an environment that merely allows for survival does not necessarily make such an environment humane.

10. Contrary to what the breeding industry states, the engineering standards specified in the proposed regulations do have a scientific foundation. The standards in the proposed regulations are more akin to acceptable husbandry practices. They will bring the engineering standards up to par with, if not above, those set forth in the Animal Welfare Act. Contrary to the hobby breeders' contention, the new regulations will not bring hobby breeders under the purview of the Dog Law. Only kennels that keep, harbor, board, shelter, sell, give away, or transfer a cumulative total of 26 or more dogs in one calendar year will be required to comply with the new regulations. As a result, true hobby breeders are still exempt from the law. Good husbandry practices dictate that anyone harboring a larger number of dogs (26 or more) should comply with certain engineering standards to ensure the health, safety, and well-being of the dogs. The Dog Law and its regulations are aimed at regulating larger and commercial breeding facilities. Therefore, the new regulations will not affect hobby breeders, contrary to what the breeding community suggests.

Once again, I commend the Department of Agriculture and the Bureau of Dog Law Enforcement for proposing regulations that will improve the conditions for dogs housed and bred in Pennsylvania's commercial kennels. The changes I have noted above will further ensure that such dogs are protected. Thank you for your time and consideration.

Sincerely,



Leslie B. Mitchell

9 Alsop Road

Pittsburgh, PA 15215

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

February 2, 2007

RE: Comments on proposed Dog Law regulations

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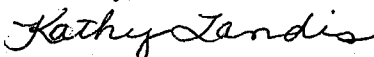
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Once again, I commend the Department of Agriculture and the Bureau of Dog Law Enforcement for proposing regulations that will improve the conditions for dogs housed and bred in Pennsylvania's commercial kennels. The changes I have noted above will further ensure that such dogs are protected. Thank you for your time and consideration.

Sincerely,



Kathy Landis
13 Witmer Twin Lane
Millersville, PA 17551

GINNY & LEE BEYER
10 Paddock Drive, New Hope, Pennsylvania 18938

February 8, 2007

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

RE: Comments on proposed Dog Law regulations

Dear Ms. Bender,

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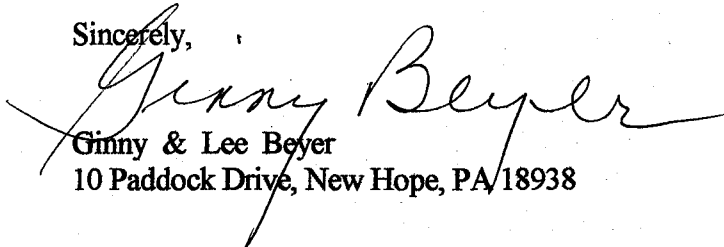
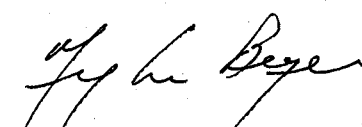
Once again, I commend the Department of Agriculture and the Bureau of Dog Law Enforcement for proposing regulations that will improve the conditions for dogs housed and

bred in Pennsylvania's commercial kennels. The changes I have noted above will further ensure that such dogs are protected.

I hope the State of Pennsylvania will be at the forefront of finally protecting dogs in the puppy mills. It is many years overdue that animals be given the same consideration as humans. We must improve the conditions for those dogs in cages who will never see freedom. It makes our hearts break to think of how many dogs are caged, never to be petted, loved, to see the outdoors, to run in a yard..... It is so important that something be done to help them.

Thank you

Sincerely,

Ginny & Lee Beyer
10 Paddock Drive, New Hope, PA 18938

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

February 9, 2007

RE: Comments on proposed Dog Law regulations

Dear Ms. Bender,

As a concerned citizen of the state of Pennsylvania, I respectfully submit this comment on the proposed changes to the Dog Law regulations.

First, I would like to commend the Department of Agriculture and the Bureau of Dog Law Enforcement for proposing amendments to the Dog Law Regulations to improve conditions for dogs housed and bred in commercial breeding operations in Pennsylvania. **It should also be noted that the proposed changes to the regulations do not bring hobby breeders under the Act. The same people who were exempt from the former regulations (i.e. hobby breeders who raise, breed, move, sell, etc. fewer than 26 dogs per year), will continue to be exempt under the revised regulations.**

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3. I commend the Department of Agriculture and the Bureau of Dog Law Enforcement for doubling the required cage size. This is perhaps the most important change that can be made to improve the quality of life for dogs in commercial breeding facilities in Pennsylvania. This provision should remain in the regulations regardless of opposition from breeders. This section should be further strengthened by adding a provision stating that where more than one dog is housed in a primary enclosure, the primary enclosure must provide adequate space for all dogs. For instance, if the enclosure houses two dogs, it must provide double the cage space that would be required for a single dog. If it houses three dogs, it must provide three times the cage space, etc.

4. I also commend the Department of Agriculture and Bureau of Dog Law Enforcement for including a provision that requires the dog wardens to visually observe the physical condition of each dog. However, the provisions regarding orders of veterinary care should be strengthened to state that the owner must provide "proof of *current and proper* veterinary care for the dog." This provision should also be amended to include excessive matting and excessively long toenails as indications of lack of proper veterinary care. Inadequate grooming can lead to painful medical issues for dogs, including skin lesions from excessive matting and leg and joint injuries from failure to keep toenails appropriately trimmed. Moreover, the section should be amended to *require* dog wardens to order a veterinary check on dogs that exhibit signs of infection, contagious disease or parasite; or that appear to be in poor health where proof of current and proper veterinary care is not provided.

5. A new subsection should be added to § 21.30 clarifying the required training for dog wardens. Training in the following areas should be added into the regulations to expand upon the requirements set forth in 3 P.S. § 459-901:

1. State laws relating to dog licensing, control and owner responsibilities;
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5. State and federal laws relating to pounds and shelters;
6. Basics of cruelty and neglect investigations for referral to appropriate authorities;
7. Report-writing and record-keeping;
8. Overview of the legal system, court structure and terminology;
9. Basics of interpreting animal behavior;
10. Identification of injury, disease, abuse and neglect in dogs;
11. Animal hoarders; and
12. Civil liability issues.

6. A new section should be added to the regulations mandating that the Department and dog wardens coordinate and work with law enforcement when applicable. It is imperative that the department work with law enforcement, and specifically Humane Society police officers, to ensure that both the cruelty laws and the Dog Law are adequately enforced.

7. A new section should be added to the regulations requiring that a licensee must have enough employees to carry out the level of husbandry practices and care required by the Act and its regulations. Additionally, the employees who provide for care and husbandry or handle animals should be supervised by an individual who has the knowledge, background, and experience in proper husbandry and care of dogs to supervise others. The licensee must be certain that the supervisor and other employees can perform to such standards.

8. Stacking primary enclosures on top of one another should be prohibited. Stacking cages creates an unnatural environment for the dogs. Additionally, it makes observation of the dogs more difficult and creates sanitation problems. Even with a tray or partition between cages, it is likely that the partitions may overflow, causing feces, urine, food, water, and hair to fall onto the dogs located in the cages below.

9. The section on wire mesh flooring should be amended to make it at least as strict as the federal Animal Welfare Act, which requires that metal strand flooring be greater than one-eighth of an inch in diameter (9 gauge) or coated with a material such as plastic or fiberglass. Language should also be added requiring that all primary enclosures that have wire mesh flooring also have a resting board of sufficient size to allow each dog in the enclosure to lie in a full lateral recumbent position and be able to make normal postural adjustments. Resting boards are necessary to provide for the comfort of the dog and to allow the animal to have some time away from living on grated fencing. Providing resting boards will result in fewer foot lesions and other foot and leg injuries to the dogs. A solid resting surface that is impervious to moisture is also a more natural environment for the animal, provides a draft-free surface and enables the dog to retain its body heat. A dog feels most vulnerable when lying down, and forcing a dog to lie over an exposed area can contribute to anxiety. Humane standards and survival standards are separate, and creating an environment that merely allows for survival does not necessarily make such an environment humane.

10. Contrary to what the breeding industry states, the engineering standards specified in the proposed regulations do have a scientific foundation. The standards in the proposed regulations are more akin to acceptable husbandry practices. They will bring the engineering standards up to par with, if not above, those set forth in the Animal Welfare Act. Contrary to the hobby breeders' contention, the new regulations will not bring hobby breeders under the purview of the Dog Law. Only kennels that keep, harbor, board, shelter, sell, give away, or transfer *a cumulative total of 26 or more dogs* in one calendar year will be required to comply with the new regulations. As a result, true hobby breeders are still exempt from the law. Good husbandry practices dictate that anyone harboring a larger number of dogs (26 or more) should comply with certain engineering standards to ensure the health, safety, and well-being of the dogs. The Dog Law and its regulations are aimed at regulating larger and commercial breeding facilities. Therefore, the new regulations will not affect hobby breeders, contrary to what the breeding community suggests.

Once again, I commend the Department of Agriculture and the Bureau of Dog Law Enforcement for proposing regulations that will improve the conditions for dogs housed and bred in Pennsylvania's commercial kennels. The changes I have noted above will further ensure that such dogs are protected. Thank you for your time and consideration.

Sincerely,



Lisa Stewart
1806 Green Street, apt. 105
Philadelphia, PA 19130

Erica K. Freeman
128 Fitzwater St.
Philadelphia, PA 19147

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

February 2, 2007

RE: Comments on proposed Dog Law regulations

Dear Ms. Bender,

As a concerned citizen of the state of Pennsylvania, I respectfully submit this comment on the proposed changes to the Dog Law regulations.

First, I would like to commend the Department of Agriculture and the Bureau of Dog Law Enforcement for proposing amendments to the Dog Law Regulations to improve conditions for dogs housed and bred in commercial breeding operations in Pennsylvania. **It should also be noted that the proposed changes to the regulations do not bring hobby breeders under the Act. The same people who were exempt from the former regulations (i.e. hobby breeders who raise, breed, move, sell, etc. fewer than 26 dogs per year), will continue to be exempt under the revised regulations.**

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1. The penalties in § 21.4(1)(iii) for "failure of an individual to comply with licensure provisions" should be increased from \$25 to \$300 per violation to \$25 to \$300 *per day of violation*.
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bred in Pennsylvania's commercial kennels. The changes I have noted above will further ensure that such dogs are protected. Thank you for your time and consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "Erica K. Freeman". The signature is written in a cursive style with a long, sweeping underline.

Erica K. Freeman

6 Oval Drive
Dallas, Pa. 18612
February 9, 2007

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

RE: Comments on proposed Dog Law regulations

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Sincerely,

A handwritten signature in cursive script that reads "Marlene B. Wood" followed by a stylized flourish.

Marlene B. Wood, M.D.

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

January 27, 2007

Dear Ms. Bender,

I am writing in response to the Dog Law Act 225 that was issued on December 16, 2006, of which I have several disagreements. The regulatory proposals in general are very difficult and costly to enforce, extremely onerous, and not feasible when put in to practice.

The new proposal only permits a licensed kennel to buy from another licensed kennel. This is fraud for the following reasons:

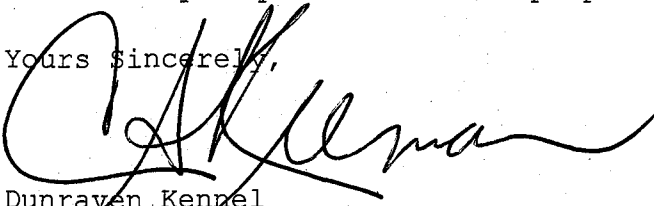
1. Unless the kennel has purchased, sold, or transferred more than 26 dogs in a calendar year to the individual, it is impossible for the kennel to know if the individual is required to have a Pennsylvania kennel license.
2. It is unlawful for the department to regulate and inspect kennels outside of Pennsylvania.
3. The Pennsylvania Department of Agriculture Dog Law Enforcement Bureau already requires the name, address, acquisition date, disposition date, type of sale, breed, sex, color, whelping date, and identification number be recorded for each and every dog sold, transferred, adopted, or given away. If the Department wishes to enforce the law, they already have all information needed.

The proposals referencing to housing and social interaction of dogs of different sizes are contrary to good husbandry, socializing and training practices. Moreover, there is no scientific or accepted husbandry basis for the amended space and exercise requirements.

The current proposal claims to be a general list of ideas to improve the breeding environment for dogs, which are neither substantiated by science nor attributed as accepted canine husbandry practices. A better idea would be for Pennsylvania to adopt USDA type standards.

I sincerely request that this proposal be withdrawn.

Yours sincerely,



Dunraven Kennel
322 Paletown Rd
Quakertown, PA 18951

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

January 19, 2007

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Yours Sincerely,



Diane Hermort
50 Hill Lane
Mohnton, PA 19540

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

January 22, 2007

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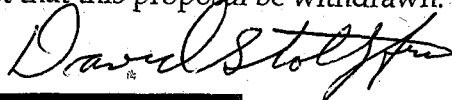
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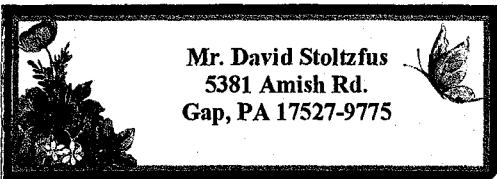
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Yours Sincerely,



Mr. David Stoltzfus
5381 Amish Rd.
Gap, PA 17527-9775



Bureau of Dog Law Enforcement
Pennsylvania Department of Agriculture
Attn: Ms. Mary Bender
2301 North Cameron Street
Harrisburg Pa. 17120-9408

RECEIVED

2007 FEB 28 PM 1:26

INDEPENDENT REGULATORY
REVIEW COMMISSION

February 10, 2007

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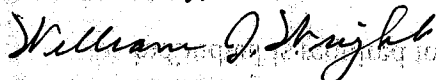
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William J. Wright

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

February 2, 2007

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7. A new section should be added to the regulations requiring that a licensee must have enough employees to carry out the level of husbandry practices and care required by the Act and its regulations. Additionally, the employees who provide for care and husbandry or handle animals should be supervised by an individual who has the knowledge, background, and experience in proper husbandry and care of dogs to supervise others. The licensee must be certain that the supervisor and other employees can perform to such standards.

8. Stacking primary enclosures on top of one another should be prohibited. Stacking cages creates an unnatural environment for the dogs. Additionally, it makes observation of the dogs more difficult and creates sanitation problems. Even with a tray or partition between cages, it is likely that the partitions may overflow, causing feces, urine, food, water, and hair to fall onto the dogs located in the cages below.

9. The section on wire mesh flooring should be amended to make it at least as strict as the federal Animal Welfare Act, which requires that metal strand flooring be greater than one-eighth of an inch in diameter (9 gauge) or coated with a material such as plastic or fiberglass. Language should also be added requiring that all primary enclosures that have wire mesh flooring also have a resting board of sufficient size to allow each dog in the enclosure to lie in a full lateral recumbent position and be able to make normal postural adjustments. Resting boards are necessary to provide for the comfort of the dog and to allow the animal to have some time away from living on grated fencing. Providing resting boards will result in fewer foot lesions and other foot and leg injuries to the dogs. A solid resting surface that is impervious to moisture is also a more natural environment for the animal, provides a draft-free surface and enables the dog to retain its body heat. A dog feels most vulnerable when lying down, and forcing a dog to lie over an exposed area can contribute to anxiety. Humane standards and survival standards are separate, and creating an environment that merely allows for survival does not necessarily make such an environment humane.

10. Contrary to what the breeding industry states, the engineering standards specified in the proposed regulations do have a scientific foundation. The standards in the proposed regulations are more akin to acceptable husbandry practices. They will bring the engineering standards up to par with, if not above, those set forth in the Animal Welfare Act. Contrary to the hobby breeders' contention, the new regulations will not bring hobby breeders under the purview of the Dog Law. Only kennels that keep, harbor, board, shelter, sell, give away, or transfer *a cumulative total of 26 or more dogs* in one calendar year will be required to comply with the new regulations. As a result, true hobby breeders are still exempt from the law. Good husbandry practices dictate that anyone harboring a larger number of dogs (26 or more) should comply with certain engineering standards to ensure the health, safety, and well-being of the dogs. The Dog Law and its regulations are aimed at regulating larger and commercial breeding facilities. Therefore, the new regulations will not affect hobby breeders, contrary to what the breeding community suggests.

Once again, I commend the Department of Agriculture and the Bureau of Dog Law Enforcement for proposing regulations that will improve the conditions for dogs housed and bred in Pennsylvania's commercial kennels. The changes I have noted above will further ensure that such dogs are protected. Thank you for your time and consideration.

Sincerely,



Mary Armour

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

January 27, 2007

Dear Ms. Bender,

I am writing in response to the Dog Law Act 225 that was issued on December 16, 2006, of which I have several disagreements. The regulatory proposals in general are very difficult and costly to enforce, extremely onerous, and not feasible when put in to practice.

The new proposal only permits a licensed kennel to buy from another licensed kennel. This is fraud for the following reasons:

1. Unless the kennel has purchased, sold, or transferred more than 26 dogs in a calendar year to the individual, it is impossible for the kennel to know if the individual is required to have a Pennsylvania kennel license.
2. It is unlawful for the department to regulate and inspect kennels outside of Pennsylvania.
3. The Pennsylvania Department of Agriculture Dog Law Enforcement Bureau already requires the name, address, acquisition date, disposition date, type of sale, breed, sex, color, whelping date, and identification number be recorded for each and every dog sold, transferred, adopted, or given away. If the Department wishes to enforce the law, they already have all information needed.

The proposals referencing to housing and social interaction of dogs of different sizes are contrary to good husbandry, socializing and training practices. Moreover, there is no scientific or accepted husbandry basis for the amended space and exercise requirements.

The current proposal claims to be a general list of ideas to improve the breeding environment for dogs, which are neither substantiated by science nor attributed as accepted canine husbandry practices. A better idea would be for Pennsylvania to adopt USDA type standards.

I sincerely request that this proposal be withdrawn.

Yours Sincerely,

Ealy's Coonhollow Kennel
108 Hilliards Rd
Petrolia, PA 16050

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

January 26, 2007

Dear Ms. Bender,

I am writing in response to the Dog Law Act 225 that was issued on December 16, 2006, of which I have several disagreements. The regulatory proposals in general are very difficult and costly to enforce, extremely onerous, and not feasible when put in to practice.

The new proposal only permits a licensed kennel to buy from another licensed kennel. This is fraud for the following reasons:

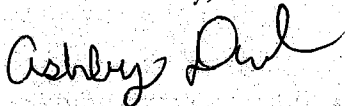
1. Unless the kennel has purchased, sold, or transferred more than 26 dogs in a calendar year to the individual, it is impossible for the kennel to know if the individual is required to have a Pennsylvania kennel license.
2. It is unlawful for the department to regulate and inspect kennels outside of Pennsylvania.
3. The Pennsylvania Department of Agriculture Dog Law Enforcement Bureau already requires the name, address, acquisition date, disposition date, type of sale, breed, sex, color, whelping date, and identification number be recorded for each and every dog sold, transferred, adopted, or given away. If the Department wishes to enforce the law, they already have all information needed.

The proposals referencing to housing and social interaction of dogs of different sizes are contrary to good husbandry, socializing and training practices. Moreover, there is no scientific or accepted husbandry basis for the amended space and exercise requirements.

The current proposal claims to be a general list of ideas to improve the breeding environment for dogs, which are neither substantiated by science nor attributed as accepted canine husbandry practices. A better idea would be for Pennsylvania to adopt USDA type standards.

I sincerely request that this proposal be withdrawn.

Yours Sincerely,



Ashley Daub
1380 Pine Grove Road
Fredericksburg, PA 17026

2559

Michelle L. Bergman
1718 Red Bud Road
Quakertown, PA 18951

March 14, 2007

Arthur Coccodrilli,
333 Market Street, 14th Floor
Harrisburg, PA 17101

Dear Mr. Coccondrilli:

I think it is a wonderful idea to crack down on the puppy mills in Pennsylvania (& beyond). The conditions these animals live in during their breeding years are horrible. These animals are not living, they are only existing for greed.

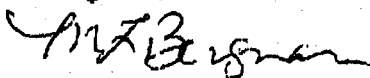
Please keep in mind how the new regulations as applied to kennels should exempt all non-profit animal welfare and rescue organizations, especially non-kennel-based rescues and fosters. These life-saving groups are organized specifically to save and care for the dogs who are given up by their new families because of sickness and genetic disorders caused by bad breeding practices.

Also, please include representatives from non-profit animal welfare and rescue groups on the Dog Law Advisory Board to better represent the interests of animals in forming these regulations. These groups have saved so many dog lives over the years. It would be a tragedy if these groups were lumped into the category as puppy mills when the regulations are written.

I am currently volunteering for the Delaware Valley Doberman Pinscher Assistance rescue. The DVDPA rescued over 100 doxies each year from shelters and owners. I, myself, have adopted from this rescue a wonderful dog that was given up due to physical issues. He is a joy in my life! His sweet disposition has endeared many in my neighborhood to him.

Please help us bring an end to the horrors of puppy mills in Pennsylvania and throughout this county. Thank you.

Regards,



Michelle L. Bergman

RECEIVED

2007 MAR 14 AM 9:20

INDEPENDENT REGULATORY
REVIEW COMMISSION

Bureau of Dog Law Enforcement
Attn: Ms. Mary Bender
Pennsylvania Department of Agriculture
2301 North Cameron Street
Harrisburg, PA 17110-9408
(717) 787-3062
Fax: 717-772-4352

Dear Ms. Bender:

1. The Dog Law regulations as applied to kennels should exempt all non-profit animal welfare and rescue organizations, especially non-kennel-based rescues and fosters. These life-saving groups are organized specifically to save and care for the dogs who are given up by their new families because of sickness and genetic disorders caused by bad breeding practices.

2. Representatives from non-profit animal welfare and rescue groups should be included on the Dog Law Advisory Board to better represent the interests of animals in forming these regulations.

Thank you for your consideration:

<u>Y. TAMILIN</u>	<u>Erie, PA</u>
<u>Norma Johnson</u>	
<u>Allison Felix</u>	
<u>Melinda Jandora</u>	<u>Erie, PA</u>
<u>[Signature]</u>	<u>Edinboro PA</u>
<u>[Signature]</u>	<u>PA</u>
<u>Mary Salomon</u>	<u>Erie, PA</u>

Mar. 12. 2007

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

Dear Ms. Bender,

Pennsylvania has a rich history of producing dogs for hunting and pets. Unfortunately, it also has a deserved reputation of having a considerable number of kennels raising puppies in deplorable conditions. We understand that the PA Dept. of Ag has for some time been charged with cleaning up this situation and we support their work. Our experience with our local dog law officers has been positive and constructive. However, we have grave concerns about the current proposal for revising the regulations. Some parts are good and others defy common sense. The worst of these seem aimed at driving most all breeders out of business rather than improving conditions. We don't see flexibility - in allowing alternate practices that achieve the intent of the regulations, and for incremental compliance, where sensible, to allow for the economic viability of kennels trying to do well.

There are good breeders that produce good to high quality purebred puppies for show and pets. Producing happy healthy puppies can be done in a variety of ways - in homes and well run kennels. These purebred puppies grow up with mostly predictable size, shape and temperament to give much love and satisfaction to their owners. (There are people in the dog world that sincerely believe that there are enough mongrels in the pounds to be adopted that kennels should not exist to produce more. We hope that this faction is not driving these revisions.)

We do support the increase in the minimum square footage for primary enclosures. However, we have problems with the following specific revisions:

1. "Housing and socialization" - We feel that in our kennel that keeping sexes and sizes apart would often be contrary to good husbandry practices.
 2. The new exercise requirements are overdue for dogs kept constantly inside in small spaces. However, our dogs (and puppies when old enough) have 24 hr/day direct access from there inside enclosures to their outside runs. This is a common practice and we find no allowance that this as an acceptable alternative to the exercise requirement.
 3. The proposed changes require the kennel owner to record every time each water bowl or food pan is washed, every time the primary and secondary pen enclosures are cleaned, and the feeding and feeding watering dates and times. Where specifically needed and useful, we do this especially with young litters, but as written these requirements are burdensome and excessive.
- It would seem that more frequent inspections of problem kennels would better serve to assess the usual care given. The detailed record keeping of common routine chores and cleaning could be used as a tool if needed for a problem kennel.
4. Smaller breeders, and dog owners who maintain there dogs in there residences, are covered by the PA Dog Law and who provide care and conditions often superior to those required by the proposed new standards would often be unable to comply with the rigid commercial standards.
 5. We have been authorized by the Dept. to install a brand new set of gravel outside runs with chain link fence (at a total cost of \$25,000). This setup has worked very well, but we see don't that it is provided for in the new regulations.

While we wholeheartedly support the continued improvement of the conditions in Pennsylvania kennels, we want those writing these revisions to use common sense and flexibility in achieving those goals. The regulations should support improvement in the kennels whose owners want to do a good job and put the disreputable ones out of business.

Sincerely,



John and Nancy Tait
Tait's Bassets, Est. 1960
121 Tait Road
Centre Hall, PA 16828

February 6, 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:

My name is Susan Balogh and I live at 401 Prospect Avenue, Donora PA 15033. I am proud to say I am owned by two wonderful Papillons. I also am involved in Papillon rescue. I became involved in Papillon rescue by being mentored by a wonderful Papillon breeder/exhibitor who also opens her heart and door to Papillon rescue also. I find that I must write to you to express my voice in the upcoming proposed amendments that Governor Rendell has made for the Pennsylvania dog law.

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, 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.

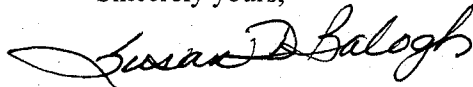
Examples of problems with the proposal are the following:

- * 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. Most townships/cities/municipalities will not grant kennel licenses and these licenses are not needed. Focus on the puppy mills and use the current laws on the books and enforce those laws!!!
- * 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. If you can have scientific basis, please send that to me and anyone who has sent in a comment letter.
- * 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.
- * 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 yours,

A handwritten signature in cursive script that reads "Susan D. Balogh". The signature is written in black ink and is positioned below the typed name.

Susan Balogh

CC: J. Barry Stout
Peter Daley
Pennsylvania Federation of Dog Clubs

PRU PETERSON
61 West Rayburn Road
Millington, NJ 07946

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

February 20, 2007

RE: Comments on proposed Dog Law regulations

Dear Ms. Bender,

I would like to commend the Department of Agriculture and the Bureau of Dog Law Enforcement for proposing amendments to the Dog Law Regulations to improve conditions for dogs housed and bred in commercial breeding operations in Pennsylvania.

The comments submitted by the ASPCA on behalf of its members are worth consideration, especially in regard to size and location of cages, comfort of the cages and opportunities for out of cage exercise. The changes the ASPCA has submitted will further ensure that the dogs are protected. I hope you will consider adding them to your new and commendable regulations.

Sincerely,

A handwritten signature in cursive script, appearing to read "Pru Peterson", followed by a horizontal line.

2559

January 24, 2007

Arthur Coccodrilli, Chairman
Independent Regulatory Review Commission
333 Market Street, 14th Floor
Harrisburg, PA 17101

RECEIVED

2007 MAR 21 PM 1:35

INDEPENDENT REGULATORY
REVIEW COMMISSION

Dear Chairman Coccodrilli,

As a Pennsylvania breeder, I am strongly opposed to the overly restrictive rules and regulations that are proposed for kennel owners. 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. The extensive number of regulations outlined in this proposal and the limited time allotted prevents the proper consultation and review of these regulations with our kennel veterinarian and other professionals. Therefore, in order to allow for the proper review and consultation of this extensive proposal, I request a ninety-day extension of the comment period.

As a Pennsylvania breeder, my goal and the goal of other law-abiding breeders is to raise the best quality and healthiest puppy possible. This is not the issue. Unfortunately, the issue created by this proposal is my rights as a citizen of this state to own property, and my rights to be afforded due process guaranteed by the provisions of our state's constitution. The vagueness of this proposal causes great concern that my rights as a citizen will be omitted by the bias opinion of those who will hear my side of the story.

As a Pennsylvania breeder, I am concerned that these overly burdensome regulations will have severe unforeseen consequences. These include reduced number of breeders willing to deal with the excessive administrative burden caused by these regulations. The shortages of puppies and resulting higher prices, which will encourage the import of oversea and out of state puppies. The ensuing shortages will provide a lucrative opportunity for those who operate beneath the law to fill these shortages. Those who participate in this black market will find the rewards well worth the risk. Additionally, the economic loss to the state will be in the millions, and will go far beyond the breeder to include pet supply retailers, cities who sponsor shows, and state tax revenue.

As a Pennsylvania breeder, I believe it is unfortunate that this proposal appears to be more about animal activism than about animal welfare. You only have to consider the one section that permits shelters and other similar facilities that provide a "service" to be exempt from these regulations. I immediately question the intent behind those who are pushing the governor on this issue. What sense does it make to remove animals from a substandard facility and place them in another substandard facility? None! Furthermore, this proposal has no incentives or educational programs for the breeders. It is all threats and punishment, which is another indication, that the motives of those supporting this proposal are more interested in eliminating our industry than in improving our industry.

Sincerely,

Scarlet-Maple Farm
Daniel P. Esh

68 Clearview Rd

Punks PA. 17572

717-768-0045

2559

RECEIVED

March 22, 2007

2007 MAR 23 AM 8:37

Department of Agriculture
Bureau of Dog Law Enforcement
Attn: Mary Bender
2301 North Cameron Street
Harrisburg, PA 17110-9408
Fax: 717-772-4352

INDEPENDENT REGULATORY
REVIEW COMMISSION

Arthur Coccodrilli, Chairman
Independent Regulatory Review Commission
333 Market Street, 14th Floor
Harrisburg, PA 17101
Fax: 717-783-2664

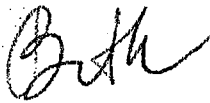
As a long-time resident of the State of Pennsylvania, I am writing to express my support for the new kennel regulations proposed by Ed Rendell, with some exceptions:

The Dog Law regulations as applied to kennels should exempt all non-profit animal welfare and rescue organizations, especially non-kennel-based rescues and fosters. These life-saving groups are organized specifically to save and care for the dogs who are given up by their new families because of sickness and genetic disorders caused by bad breeding practices.

2. Representatives from non-profit animal welfare and rescue groups should be included on the Dog Law Advisory Board to better represent the interests of animals in forming these regulations.

We've all been educated on the sick animals that come from puppy mills. Let's stop it now and show that Pennsylvania cares!

Beth Monahan
511 S. 18th Street
Philadelphia, PA 19146



Independent Regulatory Review Commission
Attn: Arthur Coccodrilli, Chairman
333 Market Street, 14th Floor
Harrisburg, PA 17101

January 20, 2007

Dear Chairman Coccodrilli,

As a kennel owner for a good number of years, I appreciate the fact that the bureau has helped to improve the dog laws. With regard to the proposed dog law changes Act 225 issued on December 16, 2006, I have a few serious concerns.

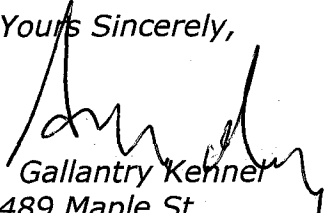
The proposed changes would require the kennel owner to record every time a water bowl or food pan is washed, every time the primary and secondary pen enclosures are cleaned, the feeding and watering dates and times, etc. These excessive and burdensome requirements will require a substantial increase in manpower with many hours dedicated to filling out written bureaucratic reports and divert the small business owner's time away from caring for their animals.

Kennels have been custom built to comply with the Department of Agriculture's Dog Law Enforcement standards that were based on USDA standards. The proposed changes of this section will require the demolition of licensed and inspected kennels and the rebuilding of entirely new dimensioned kennels. The average cost per kennel will be between \$30,000.00 and \$500,000.00 each.

The proposed changes make no sense for all kennel owners' dogs to be seized by the Dog Law Bureau based on the Governor's proposed new requirements for pen sized or quarantine regulations. Dog Law places the same dog into a humane society not required to have the proposed new standards. It is vital to have fair and uniform kennel requirements. In addition, small business owners are affected greatly and their due process rights in court are limited if the proposed changes adopted.

I sincerely urge that this proposal be rescinded.

Yours Sincerely,


Gallantry Kehner
489 Maple St.
Warminster, PA 18974

INDEPENDENT REGULATORY
REVIEW COMMISSION

2007 MAR 26 AM 9:08

RECEIVED

March 15, 2007

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

Dear Mary Bender:

I feel the need to comment on the proposed Dog Law Regulations concerning kennel regulations.

I volunteer with a non-profit animal rescue. While I understand why harsher rules and regulations are extremely necessary for puppy mills, Non-profit Animal Welfare and Rescue Organizations should remain exempt from such stipulations and regulations. These organizations are put in place to SAVE animals from certain death. In some cases, the animals that are saved are taken from high-kill shelters that might even initially receive puppies from the "infamous" puppy-mills. If it was not for what all these volunteers and fosters do, the dogs and puppies that were able to be placed, because of these rescues, would have been put to death. If these new rules and regulations were to include the Non-profit Rescues, there would be a larger number of dogs and puppies that would lose their lives and not given a chance to have a happy home. These fosters dedicate so much to each and every dog/puppy that comes to them. They do not house them in cold kennels, they take care of them in their homes and give them the love they need to thrive.

In summation (for consideration):

1. The proposed Dog Law Regulations, involving kennels, should **exempt all Non-profit Animal Rescues and Animal Welfare Organizations** (this is extremely important in helping to save lives)
2. Individuals from these organizations should be included on the **Dog Law Advisory Board** so their interests and comments are heard and included when regulations and/or stipulations are formed. This helps with the understanding of what they do and what they try to accomplish when it comes to the interests of the animals.

Sincerely,


Kimberly Olewiler

cc: IRRC/Arthur Coccodrilli

James F. Scharnberg
20 Beatty Lane, Malvern, PA 19355-8616
March 12, 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:

My name is James F. Scharnberg of 20 Beatty Lane, Malvern, Chester County, Pennsylvania. I am writing to comment on the proposed amendments to the Pennsylvania dog law regulations issued on December 16, 2006. I have been involved with hunting packs of Beagles and Basset Hounds as a master, huntsman and breeder for over 35 years in Chester County, Pennsylvania.

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.

* 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.

* 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.

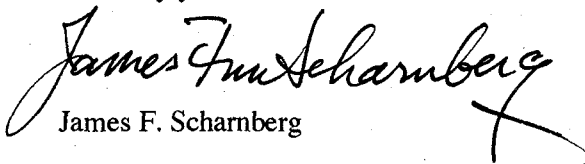
* The record keeping requirements with respect to exercise, cleaning, and other aspects of kennel management are excessively burdensome and serve no useful purpose, as it would be impossible to verify their accuracy in all but the most egregious circumstances. Such egregious circumstances already violate 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 yours,


James F. Scharnberg

March 13, 2007

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

**RE: Regulation ID # 2-152 (#2559)
Dog Law Regulations**

Dear Ms. Bender:

I submit the following comments on the Proposed Amendments to the Pennsylvania Dog Law Regulations at Title 7 of the Pennsylvania Code.

Section 21.14 Kennel Licensure Provisions

(a)(3)(ii) This section would group kennels, commercial breeders, rescue organizations, and foster homes together and subject them to the same requirements.

This provision is unreasonable as it applies to foster homes that are utilized by all volunteer rescue organizations. Dogs that are placed in foster care are kept in a home environment just like owned dogs. The foster dogs are the "temporary" pets kept by a household until the animal finds its permanent home. These animals are not crated or kept in kennel-like conditions. Instead, the animals are kept inside, in a home environment. It is unreasonable to hold a home situation to the same standards as a commercial kennel or breeding facility. Foster homes utilized by rescues provide more humane living conditions for the animals cared for by rescues, because the animals are indoors, socialized, and become housebroken. It would not be in the best interest of the animals to require the foster homes to place animals in a kennel environment instead allowing them to live inside a home.

The purpose of these revised regulations was supposed to be to better regulate living conditions for the animals raised in puppy mills and other breeding facilities. Extending the regulation to include all volunteer non-kennel based rescues and foster homes does nothing to regulate the puppy millers. Instead, the proposed regulations impose standards upon private, all volunteer rescues that they would be unable to afford to meet, forcing them to close down, thereby jeopardizing the lives of the tens of thousands of animals assisted by rescues each year.

For example, assume there are 100 foster home-based rescues in Pennsylvania, each handling 1,000 animals per year. If rescues were to close, that is 100,000 animals that would be placed into the system for municipalities and shelters to handle in an already overburdened system. The cost to taxpayers would increase due to municipalities having to handle animals previously assisted by rescues. Shelters would be more overburdened that they already are, forcing them to kill the overflow of animals—animals whose lives would have been spared in the rescue system.

Rescues serve an important function. They help animals with no cost to the taxpayers, and aid the state-wide economy by giving veterinarians tremendous business, and well as the pet stores for food and supplies. Thus, putting the rescues out of business--as the regulations would do--would have a far reaching impact on taxpayers and the state-wide economy. Thus, foster based rescues should be exempt from the provisions of these proposed regulations, and there should be an explicit provision stating that in the proposed regulations.

In addition to the exemption for rescues, the proposed regulations should put a clear limit on the number of puppies that can be produced each year by the commercial breeders, and strict fines imposed if they do not comply. The proposed regulations do nothing to stop the endless production of animals by the commercial breeders. Allowing this production to continue will sanction the killing of animals by shelters all across the Commonwealth.

Respectfully submitted,

Robert C. Quinn
1521 Misty Dr. #6
Lancaster, PA 17603
717-357-1816

cc: Arthur Coccodrilli, Chairman
Independent Regulatory Review Commission
333 Market Street, 14th Floor
Harrisburg, PA 17101

Governor Edward G. Rendell
225 Main Capitol Building
Harrisburg, PA 17120

March 13, 2007

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

**RE: Regulation ID # 2-152 (#2559)
Dog Law Regulations**

Dear Ms. Bender:

I submit the following comments on the Proposed Amendments to the Pennsylvania Dog Law Regulations at Title 7 of the Pennsylvania Code.

Section 21.14 Kennel Licensure Provisions

(a)(3)(ii) This section would group kennels, commercial breeders, rescue organizations, and foster homes together and subject them to the same requirements.

This provision is unreasonable as it applies to foster homes that are utilized by all volunteer rescue organizations. Dogs that are placed in foster care are kept in a home environment just like owned dogs. The foster dogs are the "temporary" pets kept by a household until the animal finds its permanent home. These animals are not crated or kept in kennel-like conditions. Instead, the animals are kept inside, in a home environment. It is unreasonable to hold a home situation to the same standards as a commercial kennel or breeding facility. Foster homes utilized by rescues provide more humane living conditions for the animals cared for by rescues, because the animals are indoors, socialized, and become housebroken. It would not be in the best interest of the animals to require the foster homes to place animals in a kennel environment instead allowing them to live inside a home.

The purpose of these revised regulations was supposed to be to better regulate living conditions for the animals raised in puppy mills and other breeding facilities. Extending the regulation to include all volunteer non-kennel based rescues and foster homes does nothing to regulate the puppy millers. Instead, the proposed regulations impose standards upon private, all volunteer rescues that they would be unable to afford to meet, forcing them to close down, thereby jeopardizing the lives of the tens of thousands of animals assisted by rescues each year.

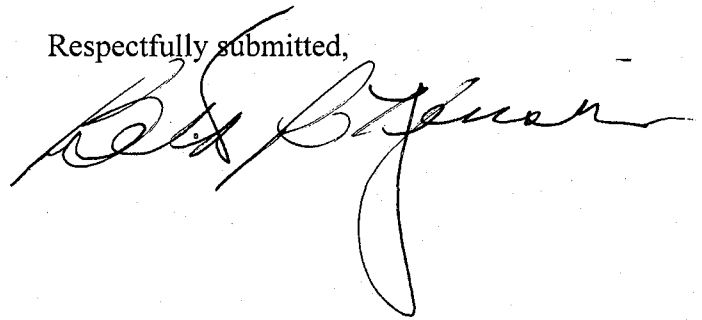
For example, assume there are 100 foster home-based rescues in Pennsylvania, each handling 1,000 animals per year. If rescues were to close, that is 100,000 animals that would be placed into the system for municipalities and shelters to handle in an already overburdened system. The cost to taxpayers would increase due to municipalities having to handle animals previously assisted by rescues. Shelters would be more overburdened

that they already are, forcing them to kill the overflow of animals—animals whose lives would have been spared in the rescue system.

Rescues serve an important function. They help animals with no cost to the taxpayers, and aid the state-wide economy by giving veterinarians tremendous business, and well as the pet stores for food and supplies. Thus, putting the rescues out of business--as the regulations would do--would have a far reaching impact on taxpayers and the state-wide economy. Thus, foster based rescues should be exempt from the provisions of these proposed regulations, and there should be an explicit provision stating that in the proposed regulations.

In addition to the exemption for rescues, the proposed regulations should put a clear limit on the number of puppies that can be produced each year by the commercial breeders, and strict fines imposed if they do not comply. The proposed regulations do nothing to stop the endless production of animals by the commercial breeders. Allowing this production to continue will sanction the killing of animals by shelters all across the Commonwealth.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Robert P. Ryan". The signature is fluid and cursive, with a large, sweeping flourish at the end.

cc: Arthur Coccodrilli, Chairman
Independent Regulatory Review Commission
333 Market Street, 14th Floor
Harrisburg, PA 17101

Governor Edward G. Rendell
225 Main Capitol Building
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March 13, 2007

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The purpose of these revised regulations was supposed to be to better regulate living conditions for the animals raised in puppy mills and other breeding facilities. Extending the regulation to include all volunteer non-kennel based rescues and foster homes does nothing to regulate the puppy millers. Instead, the proposed regulations impose standards upon private, all volunteer rescues that they would be unable to afford to meet, forcing them to close down, thereby jeopardizing the lives of the tens of thousands of animals assisted by rescues each year.

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Respectfully submitted,



Cyndi Lindenmuth
CPAA Member

cc: Arthur Coccodrilli, Chairman
Independent Regulatory Review Commission
333 Market Street, 14th Floor
Harrisburg, PA 17101

Governor Edward G. Rendell
225 Main Capitol Building
Harrisburg, PA 17120

Judy Rompilla
3309 Valley View Road
Bethlehem, PA 18020
March 15, 2007

Department of Agriculture
Bureau of Dog Law Enforcement
Attn: Mary Bender
2301 North Cameron Street
Harrisburg, PA 17110

Dear Mary,

I am writing this letter in support of the new, more humane regulations for puppy mill dogs in Pennsylvania. Changes to the regulations that affect dogs in puppy mills could include the following requirements:

- Doubling the minimum cage size
- Requiring daily exercise outside of the cage
- Required heat when the temperature drops below 50 degrees
- Required cooling (by fan or air conditioning) when the temperature is above 85 degrees
- Improving ventilation in kennel areas
- Denying kennel licenses to individuals convicted of animal cruelty within the past 10 years

There has been some concern that animal shelters and rescue groups may be affected by the kennel regulations due to the addition of a new definition of "temporary home." I am asking for an exemption for shelters from the kennel expansion and exercise requirements. Foster homes should be exempt from kennel housing requirements and instead have separate performance standards appropriate for home care setting.

Sincerely,



Judy Rompilla

Dog Law Bureau Director, Independent Regulatory Review Commission:

I support the changes to the commercial dog regulations submitted by the Coalition Against Misery. The proposed regulations by the Pennsylvania Department of Agriculture that were recently published in the Pennsylvania Bulletin do not adequately address the issues of temperature control, cage conditions and humane breeding practices.

I am strongly opposed to commercial breeding kennels where the costs are minimized by providing substandard care and conditions for the dogs in an effort to increase the profit. I am writing to request that you immediately take steps to address the horrific conditions in commercial kennels in Pennsylvania. Every kennel must be required to have a visible, safe source of heat and air-conditioning. Additionally, the regulations should limit the number of dogs that are kept in a cage. And finally, I ask that you include breeding regulations consistent with those established by reputable breed clubs.

It's deplorable how some humans treat animals and go about their lives as if they are doing nothing wrong. It is wrong how they treat them!!! There is absolutely no denying this!! It makes me mad and sick to my stomach to think of all those poor, abused babies that will never know a kind gesture or word, will suffer horribly and die never knowing how precious they truly are. I will never buy a baby from a pet store. I acquire mine from shelters only. The reason is two-fold: I not only get to take care of, love and cherish these babies, but I get to convey to them how important and precious and loved they are. Secondly, I am refusing to buy from pet stores, so that is one less person that will help to propagate those hideous, inane puppy mills.

It is a profound embarrassment that Pennsylvania is known as the Puppy Mill Capital of the East Coast. Please take steps to ensure that the new regulations provide humane conditions for the dogs. Thank you.

Very respectfully,


Jocelyn Hart

Betsy's Cocker Place, Inc.

24 East Avenue
New Canaan, CT 06840
203-972-3000

www.betsyscockerplace.com
info@betsyscockerplace.com

March 14, 2007

To: Dog Law Bureau Director, Independent Regulatory Review Commission:

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It is a profound embarrassment that Pennsylvania is known as the Puppy Mill Capital of the East Coast. Please take steps to ensure that the new regulations provide humane conditions for the dogs. Thank you.

Sincerely,

BETSY'S COCKER PLACE, INC



By: Jane Dweck

It's The Pits

K-9 Rescue
P.O. Box 720008
San Diego, CA 92172-0008

March 14, 2007

Mary Bender
Dog Law Bureau Director
Fax (717) 772-4352

Dear Ms. Bender:

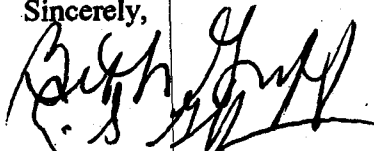
We are a nonprofit dog rescue located in San Diego County, and are writing you to support the changes to the commercial dog regulations submitted by the **Coalition Against Misery**. The proposed regulations by the Pennsylvania Department of Agriculture that were recently published in the Pennsylvania Bulletin do not adequately address the issues of temperature control, cage conditions and humane breeding practices.

We are strongly opposed to commercial breeding kennels where the costs are minimized by providing substandard care and conditions for the dogs in an effort to increase the profit. We are writing to request that you immediately take steps to address the horrific conditions in commercial kennels in Pennsylvania. Every kennel must be required to have a visible, safe source of heat and air-conditioning. Additionally, the regulations should limit the number of dogs that are kept in a cage. And finally, we ask that you include breeding regulations consistent with those established by reputable breed clubs.

It is a profound embarrassment that Pennsylvania is known as the Puppy Mill Capital of the East Coast. Please take steps to ensure that the new regulations provide humane conditions for the dogs.

Thank you for your support.

Sincerely,



Beth and Eric Gruff
It's The Pits
www.ItsThePits.org

**LORI NICELY
5 Watchwater Court
Rockville, MD 20850**

March 14, 2007

ATTN: Mary Bender, Dog Law Bureau Director

Dear Mary:

As an animal rights advocate, a member of People for the Ethical Treatment of Animals (PETA), and a regular contributor to: The Humane Society of the United States, Pennsylvania based Dogs Deserve Better www.dogsdeservebetter.com, Montgomery County Humane Society (MD), Frederick County Humane Society (MD), Animal Welfare League of Arlington (VA) and Alleghany Humane Society (VA), I am writing to ask you to please support the changes to the commercial dog regulations submitted by the Coalition Against Misery.

The time is long overdue for us as a society to significantly improve our treatment of our companion animals.

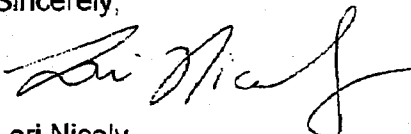
The proposed regulations by the Pennsylvania Department of Agriculture that were recently published in the Pennsylvania Bulletin do not adequately address the issues of temperature control, cage conditions and humane breeding practices.

I am strongly opposed to commercial breeding kennels where the costs are minimized by providing substandard care and conditions for the dogs in an effort to increase the profit. Allowing this to occur in this day and age, in the United States, is an outrage. Causing the needless suffering of an innocent dog is animal cruelty, against the law, and it can and should be remedied immediately.

I am writing to request that you immediately take steps to address the horrific conditions in commercial kennels in Pennsylvania. Every kennel must be required to have a visible, safe source of heat and air-conditioning. Additionally, the regulations should limit the number of dogs that are kept in a cage. And finally, please include breeding regulations consistent with those established by reputable breed clubs.

Please take steps to ensure that the new regulations provide humane conditions for the dogs. Our society may be judged on how well we protect those who cannot protect themselves.

Sincerely,



Lori Nicely

Dog Law Bureau Director, Independent Regulatory Review Commission

I support the changes to the commercial dog regulations submitted by the Coalition Against Misery. The proposed regulations by the Pennsylvania Department of Agriculture that were recently published in the Pennsylvania Bulletin do not adequately address the issues of temperature control, cage conditions and humane breeding practices.

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It is a profound embarrassment that Pennsylvania is known as the Puppy Mill Capital of the East Coast. Please take steps to ensure that the new regulations provide humane conditions for the dogs. Thank you

Jim Fealze
108 Cottonwood
Columbus NE, 68601

March 14, 2007

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Please keep in mind, there is absolutely no reason that breeding dogs is even necessary. Shelters are beyond overflowing with animals that are put to sleep by the thousands everyday in this country. Besides the horrific treatment of these poor souls in puppy mills, where is the real necessity here? It's all about greed. That is the bottom line. It's not about the love of animals or the respect of a certain breed. And who pays the price for this? Countless helpless puppies and dogs. What a heart-break. This must stop now. Please do the right thing and be a voice for the voiceless and end this horror.

It is a profound embarrassment that Pennsylvania is known as the Puppy Mill Capital of the East Coast. Please take steps to ensure that the new regulations provide humane conditions for the dogs. Thank you for your time and understanding in this matter.

Sincerely,



Christine Murphy
21 Southall Court
Parsippany, NJ 07054

FOSTERCOMPASSION@AOL.COM

Timothy Leighton

10228 Park Willow Dr , Charlotte, North Carolina 28210

March 14, 2007 07:00 AM

Mary Bender
Dog Law Bureau Director

Subject: Pennsylvania Commercial Dog Regulation Changes

Dog Law Bureau Director:

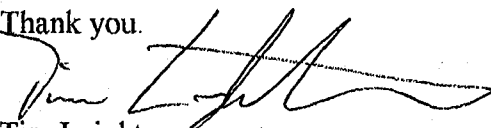
Everyone involved in the regulation, enforcement and administration of Pennsylvania's commercial dog regulations should be ashamed of themselves for how long its taken to address the pathetic conditions in which breeders are allowed to keep animals for sake of profit. How disgusting to think that people call this "earning a living" and government is willing to protect this practice by not passing the needed reform or only making minor changes. It's impossible for me to consider anyone condoning these activities decent human beings. All puppy mill breeding should be outlawed.

I support the changes to the commercial dog regulations submitted by the Coalition Against Misery. The proposed regulations by the Pennsylvania Department of Agriculture that were recently published in the Pennsylvania Bulletin do not adequately address the issues of temperature control, cage conditions and humane breeding practices.

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Thank you.


Tim Leighton

3/14/07

March 13, 2007

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This provision is unreasonable as it applies to foster homes that are utilized by all volunteer rescue organizations. The Dog Law regulations as applied to kennels should exempt all non-profit animal welfare and rescue organizations, especially non-kennel-based rescues and fosters. These life-saving groups are organized specifically to save and care for the dogs who are given up by their new families because of sickness and genetic disorders caused by bad breeding practices.

Dogs that are placed in foster care are kept in a home environment just like owned dogs. The foster dogs are the "temporary" pets kept by a household until the animal finds its permanent home. These animals are not crated or kept in kennel-like conditions. Instead, the animals are kept inside, in a home environment. It is unreasonable to hold a home situation to the same standards as a commercial kennel or breeding facility. Foster homes utilized by rescues provide more humane living conditions for the animals cared for by rescues, because the animals are indoors, socialized, and become housebroken. It would not be in the best interest of the animals to require the foster homes to place animals in a kennel environment instead allowing them to live inside a home.

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For example, assume there are 100 foster home-based rescues in Pennsylvania, each handling 1,000 animals per year. If rescues were to close, that is 100,000 animals that would be placed into the system for municipalities and shelters to handle in an already overburdened system. The cost to taxpayers would increase due to municipalities having to handle animals previously assisted by rescues. Shelters would be more overburdened that they already are, forcing them to kill the overflow of animals—animals whose lives would have been spared in the rescue system.

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Moreover, representatives from non-profit animal welfare and rescue groups should be included on the Dog Law Advisory Board to better represent the interests of animals in forming these regulations.

Respectfully submitted,



Cathy D. Kassab
702 Windsor Ct.
State College, PA 16801

cc: Arthur Coccodrilli, Chairman
Independent Regulatory Review Commission
333 Market Street, 14th Floor
Harrisburg, PA 17101

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