

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

2559

Dear Ms. Bender:

Having purchased dogs from wonderful, ethical, breeders and boarded them in clean, air conditioned/heated boarding kennels, owned and operated by animal loving, ethical professionals, I feel compelled to voice my opinion.

Although, perhaps, well intentioned, the proposed amendments of December 16, 2006 to the Pennsylvania Dog Law Regulations greatly concern me.

I agree that inhumane and substandard kennel conditions should not be tolerated, however, I emphatically disagree with the proposed regulatory changes.

I believe these changes are impractical, will create a great burden from a financial standpoint, will not be enforceable and, most importantly, will not improve the quality of the lives of the dogs entrusted to the aforementioned, ethical breeders and boarding kennels.

These regulations will also require wholesale renovation, if not rebuilding of many kennels already built in compliance with current federal and/or state standards. Small, boarding kennels, and breeding facilities, whose care and conditions are far superior to those required by the proposed new standards, would be unable to comply with the rigid commercial kennel standards.

These small breeders and boarding kennels would be forced out of business, face a loss of income, and deprive their communities of their outstanding services.

I strongly urge that this proposal be withdrawn.

Sincerely,

James W. Doble
RR1 Box 215-B
PITTSBURGH PA 15243

RECEIVED

2007 FEB -2 AM 9:52

INDEPENDENT REGULATORY
REVIEW COMMISSION

2559

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

Dear Ms. Bender:

Having purchased dogs from wonderful, ethical, breeders and boarded them in clean, air conditioned/heated boarding kennels, owned and operated by animal loving, ethical professionals, I feel compelled to voice my opinion.

Although, perhaps, well intentioned, the proposed amendments of December 16, 2006 to the Pennsylvania Dog Law Regulations greatly concern me.

I agree that inhumane and substandard kennel conditions should not be tolerated, however, I emphatically disagree with the proposed regulatory changes.

I believe these changes are impractical, will create a great burden from a financial standpoint, will not be enforceable and, most importantly, will not improve the quality of the lives of the dogs entrusted to the aforementioned, ethical breeders and boarding kennels.

These regulations will also require wholesale renovation, if not rebuilding of many kennels already built in compliance with current federal and/or state standards. Small, boarding kennels, and breeding facilities, whose care and conditions are far superior to those required by the proposed new standards, would be unable to comply with the rigid commercial kennel standards.

These small breeders and boarding kennels would be forced out of business, face a loss of income, and deprive their communities of their outstanding services.

I strongly urge that this proposal be withdrawn

Sincerely,

Jean S Pedley
3 Harmony Dr.
Lake Ariel PA
18436
1-20-07

RECEIVED

2007 FEB -2 AM 9:52

INDEPENDENT REGULATORY
REVIEW COMMISSION

2559

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,

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,

Green Meadow Kennel

Green Meadow Kennel
445 S. Fairmount Rd
Ephrata, PA 17522

INDEPENDENT REGULATORY
COMMISSION

2007 FEB -2 AM 9:53

RECEIVED

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

2559

January 23, 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.

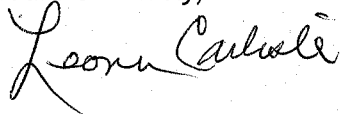
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The proposed changes make no sense for all kennel owners' dogs to be seized by the Dog Law Bureau based on the Governor's proposed new requirements for pen sized or quarantine regulations. Dog Law places the same dog into a humane society not required 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,



H & H Boarding Kennel
769 State Route 168
Darlington, PA 16115

2007 FEB -2 AM 11:04
RECEIVED
INDEPENDENT REGULATORY
REVIEW COMMISSION

**K-9 Bed & Breakfast Boarding Kennels
60 Church St
Curwensville, PA 16833**

January 20, 2007

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

Dear Chairman Coccodrilli,

I am writing in response to oppose the Dog Law Regulations Act 225 recently issued on December 16, 2006. The current regulatory proposals in general are unenforceable and extremely onerous when put into practice.

The proposed regulations call for kennels to be specific in regard to exercise and cleaning records. These would require a substantial increase in manpower and time dedicated to filling out written bureaucratic reports, it would be impossible to verify their accuracy. This change would also divert the small business owner's time away from caring for their animals.

The 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.

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.

Additionally, 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.

I sincerely urge that this proposal be rescinded and the USDA standard be adopted in Pennsylvania.

Yours Sincerely,

Greg Hipp owner

Roseen Cressler manager

INDEPENDENT REGULATORY
REVIEW COMMISSION

2007 FEB -2 AM 10:56

RECEIVED

**Beaver Run Kennel
401 Rader Rd
Philipsburg, PA 16866**

2559

January 24, 2007

Independent Regulatory Review Commission

Attn: Arthur Coccodrilli, Chairman

333 Market Street, 14th Floor

Harrisburg, PA 17101

Dear Chairman Coccodrilli,

I am writing in opposition to the proposed changes to the Dog Law Act 225 which was issued on December 16, 2006. I completely understand that substandard kennel conditions should not be permitted, but most of the proposed regulatory changes are impractical and costly.

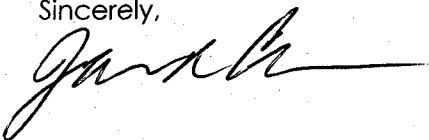
These proposals call for change in definitions and requirements of licensed and inspected kennels within the Commonwealth. These extensive changes must go through Pennsylvania's House and Senate legislative processes.

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.

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 would 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. I sincerely urge that this proposal be rescinded and the USDA standard be adopted in Pennsylvania.

Sincerely,



INDEPENDENT REGULATORY
REVIEW COMMISSION

2007 FEB -2 AM 10:56

RECEIVED

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

January 22, 2007

Dear Chairman Coccodrilli,

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,



Pet Place
5522 Shaffer Road, Ste 128
Dubois, PA 15801

INDEPENDENT REGULATORY
REVIEW COMMISSION

2007 FEB -2 AM 10:57

RECEIVED

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.

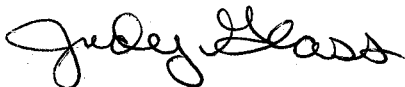
The proposed changes would require the kennel owner to record every time a water bowl or food pan is washed, every time the primary and secondary pen enclosures are cleaned, the feeding and watering dates and times, etc. These excessive and burdensome requirements will require a substantial increase 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,



Judy Glass
P O Box 664
Carrolltown, PA 15722

INDEPENDENT REGULATORY
REVIEW COMMISSION

2007 FEB -2 AM 10:58

RECEIVED

*Breuer's Ban Dogs
RR 2 Box 228B
Ulster, PA 18850*

2559

January 31, 2007

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

Dear Chairman Coccodrilli,

I am writing in opposition to the proposed changes to the Dog Law Act 225 which was issued on December 16, 2006. I completely understand that substandard kennel conditions should not be permitted, but most of the proposed regulatory changes are impractical and costly.

These proposals call for change in definitions and requirements of licensed and inspected kennels within the Commonwealth. These extensive changes must go through Pennsylvania's House and Senate legislative processes.

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.

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 would 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.

I sincerely urge that this proposal be rescinded and the USDA standard be adopted in Pennsylvania.

Sincerely,

Robert D. Breuer

INDEPENDENT REGULATORY
REVIEW COMMISSION

2007 FEB -2 AM 11:01

RECEIVED

**Knega Kennels
101 Grist Mill Rd
Glen Mills, PA 19342**

January 26, 2007

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

Dear Chairman Coccodrilli,

I am writing in response to oppose the Dog Law Regulations Act 225 recently issued on December 16, 2006. The current regulatory proposals in general are unenforceable and extremely onerous when put into practice.

The proposed regulations call for kennels to be specific in regard to exercise and cleaning records. These would require a substantial increase in manpower and time dedicated to filling out written bureaucratic reports, it would be impossible to verify their accuracy. This change would also divert the small business owner's time away from caring for their animals.

The 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.

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.

Additionally, 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.

I sincerely urge that this proposal be rescinded and the USDA standard be adopted in Pennsylvania.

Yours Sincerely,

Roland and Carol Appleton

INDEPENDENT REGULATORY
REVIEW COMMISSION

27 FEB -2 AM 11:01

RECEIVED

A Pet Getaway
RR 6 Box 1409
Mount Pleasant, PA 15666

2559

January 20, 2007

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

Dear Chairman Coccodrilli,

I am writing in opposition to the proposed changes to the Dog Law Act 225 which was issued on December 16, 2006. I completely understand that substandard kennel conditions should not be permitted, but most of the proposed regulatory changes are impractical and costly.

These proposals call for change in definitions and requirements of licensed and inspected kennels within the Commonwealth. These extensive changes must go through Pennsylvania's House and Senate legislative processes.

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.

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 would 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.

I sincerely urge that this proposal be rescinded and the USDA standard be adopted in Pennsylvania.

Sincerely,

Anthony J. Caletti

RECEIVED
2007 FEB -2 AM 11:02
INDEPENDENT REGULATORY
REVIEW COMMISSION

2559

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

January 27, 2007

Dear Chairman Coccodrilli,

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, *Seana Messinger*

Windy Pines Kennel
370 California Rd
Morgantown, PA 19543

INDEPENDENT REGULATORY
REVIEW COMMISSION

2007 FEB -2 AM 11:02

RECEIVED

Kromerhaus Kennels Inc
991 Pear Rd
Walnutport, PA 18088

2559

January 26, 2007

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

Dear Chairman Coccodrilli,

I am writing in response to oppose the Dog Law Regulations Act 225 recently issued on December 16, 2006. The current regulatory proposals in general are unenforceable and extremely onerous when put into practice.

The proposed regulations call for kennels to be specific in regard to exercise and cleaning records. These would require a substantial increase in manpower and time dedicated to filling out written bureaucratic reports, it would be impossible to verify their accuracy. This change would also divert the small business owner's time away from caring for their animals.

The 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.

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.

Additionally, 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.

I sincerely urge that this proposal be rescinded and the USDA standard be adopted in Pennsylvania.

Yours Sincerely,

Randy Kromer, Pres.

INDEPENDENT REGULATORY
REVIEW COMMISSION

2007 FEB -2 AM 10:50

RECEIVED

Vera Martin
526 Quarry Rd
New Holland, PA 17557

2559

January 30, 2007

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

Dear Chairman Coccodrilli,

I am writing in response to oppose the Dog Law Regulations Act 225 recently issued on December 16, 2006. The current regulatory proposals in general are unenforceable and extremely onerous when put into practice.

The proposed regulations call for kennels to be specific in regard to exercise and cleaning records. These would require a substantial increase in manpower and time dedicated to filling out written bureaucratic reports, it would be impossible to verify their accuracy. This change would also divert the small business owner's time away from caring for their animals.

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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.

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I sincerely urge that this proposal be rescinded and the USDA standard be adopted in Pennsylvania.

Yours Sincerely,

Vera Martin

INDEPENDENT REGULATORY
REVIEW COMMISSION

2007 FEB -2 AM 10:52

RECEIVED

Kings Kennel
137 Townlane Rd
Rebersburg, PA 16872

2559

January 26, 2007

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

Dear Chairman Coccodrilli,

I am writing in response to oppose the Dog Law Regulations Act 225 recently issued on December 16, 2006. The current regulatory proposals in general are unenforceable and extremely onerous when put into practice.

The proposed regulations call for kennels to be specific in regard to exercise and cleaning records. These would require a substantial increase in manpower and time dedicated to filling out written bureaucratic reports, it would be impossible to verify their accuracy. This change would also divert the small business owner's time away from caring for their animals.

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I sincerely urge that this proposal be rescinded and the USDA standard be adopted in Pennsylvania.

Yours Sincerely,

Lavina S. King

RECEIVED
2007 FEB -2 AM 10:53
INDEPENDENT REGULATORY
REVIEW COMMISSION

Levi Brubaker
RD 2 Box 122
Martinsburg, PA 16662

2559

January 31, 2007

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

Dear Chairman Coccodrilli,

I am writing in opposition to the proposed changes to the Dog Law Act 225 which was issued on December 16, 2006. I completely understand that substandard kennel conditions should not be permitted, but most of the proposed regulatory changes are impractical and costly.

These proposals call for change in definitions and requirements of licensed and inspected kennels within the Commonwealth. These extensive changes must go through Pennsylvania's House and Senate legislative processes.

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.

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 would 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.

I sincerely urge that this proposal be rescinded and the USDA standard be adopted in Pennsylvania.

Sincerely, *Levi Brubaker*

RECEIVED
2007 FEB -2 AM 10:54
INDEPENDENT REGULATORY
REVIEW COMMISSION

Warren Nolt
RR 1 Box 597
Martinsburg, PA 16662

January 30, 2007

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

Dear Chairman Coccodrilli,

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

With a full understanding that the bureau is trying to improve substandard kennel conditions, I am not in agreement that most of the changes are necessary.

The proposed record keeping would require me to write down the date and time I washed each food and water bowl, every time a pen is cleaned; each individual outside run is cleaned, etc. It would be better for me to have my general daily procedures that I routinely follow, in writing. This is similar to how the USDA regulations are worded.

The proposed changes would also require the demolition of Pennsylvania's licensed and inspected kennels. Yet, there is no scientific basis for the change. In addition, the average cost to rebuild kennel will be between \$30,000.00 and \$500,000.00 each.

I sincerely urge that this proposal be withdrawn, as the beneficial outcome will be in question if the proposal is adopted.

Yours truly,

Warren G Nolt
1-31-07

INDEPENDENT REGULATORY
REVIEW COMMISSION

2007 FEB -2 AM 10:55

RECEIVED

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

January 27, 2007

Dear Chairman Coccodrilli,

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,

Elmer J. Stoltzfus Jr.

E & L Kennel
233 Stoltzfus Lane
Mill Hall, PA 17751

INDEPENDENT REGULATORY
REVIEW COMMISSION

2007 FEB -2 AM 10:53

RECEIVED

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

January 26, 2007

Dear Chairman Coccodrilli,

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:

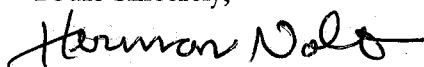
1. Unless the kennel has purchased, sold, or transferred more than 26 dogs in a calendar year to the individual, it is impossible for the kennel to know if the individual is required to have a Pennsylvania kennel license.
2. It is unlawful for the department to regulate and inspect kennels outside of 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,



Cross Cove Canines
Rd 1 Box 276
Roaring Spring, PA 16673

INDEPENDENT REGULATORY
REVIEW COMMISSION

2007 FEB -2 AM 10:54

RECEIVED

Floyd L Martin
12174 State Route 304
Mifflinburg, PA 17844

January 20, 2007

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

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.

With a full understanding that the bureau is trying to improve substandard kennel conditions, I am not in agreement that most of the changes are necessary.

The proposed record keeping would require me to write down the date and time I washed each food and water bowl, every time a pen is cleaned; each individual outside run is cleaned, etc. It would be better for me to have my general daily procedures that I routinely follow, in writing. This is similar to how the USDA regulations are worded.

The proposed changes would also require the demolition of Pennsylvania's licensed and inspected kennels. Yet, there is no scientific basis for the change. In addition, the average cost to rebuild kennel will be between \$30,000.00 and \$500,000.00 each.

I sincerely urge that this proposal be withdrawn, as the beneficial outcome will be in question if the proposal is adopted.

Yours truly,

Floyd L. Martin

INDEPENDENT REGULATORY
COMMISSION

2007 FEB -2 AM 8:16

RECEIVED

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 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.
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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,



Country Boy Kennel
170 Truce Rd
New Providence, PA 17560

RECEIVED
2007 FEB - 2 AM 9:13
INDEPENDENT REGULATORY
PENNY COMMISSION

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 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:

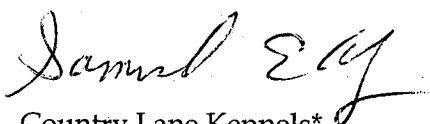
1. Unless the kennel has purchased, sold, or transferred more than 26 dogs in a calendar year to the individual, it is impossible for the kennel to know if the individual is required to have a Pennsylvania kennel license.
2. It is unlawful for the department to regulate and inspect kennels outside of 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,



Country Lane Kennels*
223 Refton Rd.
New Providence, PA 17560

INDEPENDENT REGULATORY
REVIEW COMMISSION

2007 FEB -2 AM 8:15

RECEIVED

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 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:

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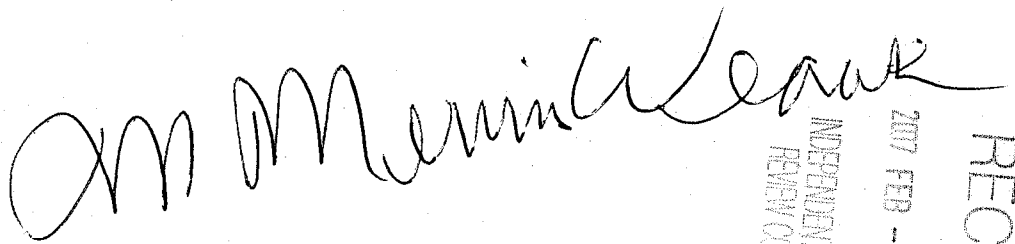
The proposals referencing to housing and social interaction of dogs of different sizes are contrary to good husbandry, socializing and training practices. Moreover, there is no scientific or accepted husbandry basis for the amended space and exercise requirements.

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,

Colonial Kennel
1570 Weaverland Rd
East Earl, PA 17519



RECEIVED
2007 FEB -2 AM 8:16
INDEPENDENT REGULATORY
REVIEW COMMISSION

2559

Lester S. Martin
181 Martin Rd
New Holland, PA 17557

January 30, 2007

IRRC

Attn: Mr. John H. Jewett
14th Floor Harrisstown 2
333 Market St.
Harrisburg, PA 17101

RE: Proposed Changes to PA Dog Law Regulations (36 Pa. B. 7596)

Dear Mr. Jewett,

I am writing in response to oppose the Dog Law Regulations Act 225 recently issued on December 16, 2006. The current regulatory proposals in general are unenforceable and extremely onerous when put into practice.

The proposed regulations call for kennels to be specific in regard to exercise and cleaning records. These would require a substantial increase in manpower and time dedicated to filling out written bureaucratic reports, it would be impossible to verify their accuracy. This change would also divert the small business owner's time away from caring for their animals.

The 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.

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.

Additionally, 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.

I sincerely urge that this proposal be rescinded and the USDA standard be adopted in Pennsylvania.

Yours Sincerely,

Lester S. Martin

RECEIVED
2007 FEB -2 AM 11:11
DEPARTMENT OF AGRICULTURE
PENNSYLVANIA COMMISSION

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,



Four Paws Inn
3234 Burtner Rd
Natrona Heights, PA 15065

INDEPENDENT REGULATORY
REVIEW COMMISSION

2007 FEB -2 AM 11:06

RECEIVED

Henry U Stoltzfus
1442 South Garfield Road
Mount Joy, PA 17552

2559

January 12, 2007

IRRC

Attn: Mr. John H. Jewett
14th Floor Harristown 2
333 Market St.
Harrisburg, PA 17101

RE: Proposed Changes to PA Dog Law Regulations (36 Pa. B. 7596)

Dear Mr. Jewett,

I am writing in response to oppose the Dog Law Regulations Act 225 recently issued on December 16, 2006. The current regulatory proposals in general are unenforceable and extremely onerous when put into practice.

The proposed regulations call for kennels to be specific in regard to exercise and cleaning records. These would require a substantial increase in manpower and time dedicated to filling out written bureaucratic reports, it would be impossible to verify their accuracy. This change would also divert the small business owner's time away from caring for their animals.


The 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.

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.

Additionally, 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.

I sincerely urge that this proposal be rescinded and the USDA standard be adopted in Pennsylvania.

Yours Sincerely,

Henry U. 

INDEPENDENT REGULATORY
FEEDBACK COMMISSION
2007 FEB -2 AM 11:12
RECEIVED

IRRC
 Attn: Mr. John H. Jewett
 14th Floor Harrisstown 2
 333 Market St.
 Harrisburg, PA 17101

January 27, 2007

RE: Proposed Changes to PA Dog Law Regulations (36 Pa. B. 7596)

INFORMATION
 SERVICE
 DIVISION

2007 FEB -2 AM 11:11

RECEIVED

Dear Mr. Jewett,

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,

Suzanne Warfield
 SUZANNE WARFIELD
 Willowood Toy Dog Kennel
 1112 Berne Dr.
 Auburn, PA 17922

member Better Business Bureau

*professional show handler,
 breeder of fine Japanese Crys
 and owner of fully licensed
 boarding Kennel for small
 breeds only Please reconsider
 this proposal!*

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.

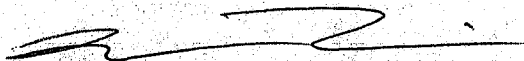
8. Stacking primary enclosures on top of one another should be prohibited. Stacking cages creates an unnatural environment for the dogs. Additionally, it makes observation of the dogs more difficult and creates sanitation problems. Even with a tray or partition between cages, it is likely that the partitions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



Yoko Takahashi

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.

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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.

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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,

Carol P. Pomero

February 5, 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,

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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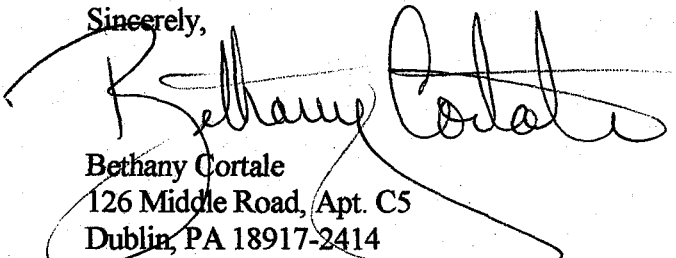
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Bethany Cortale
126 Middle Road, Apt. C5
Dublin, PA 18917-2414

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



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February 2, 2007

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Alison K Brown, M.Ed., CPDT

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

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P.O. Box 231
Chesapeake, Md 21915

Ingrid E. Naugle, M.D.

26 Newgate Road • Pittsburgh, PA 15202
(412) 761-2338 • FAX (412) 761-4746

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

Dear Ms Bender,
I care for the welfare of
animals, and this issue
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February 2, 2007

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A handwritten signature in cursive script, reading "Ingrid Wangle". The signature is written in dark ink on a white background.

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Cathi Book

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Pittsburgh PA 15215

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Elveroth, PA. 19520-0098

Bureau of Dog Law Enforcement
Pennsylvania Department of Agriculture
Attn: Ms. Mary Bender
2301 North Cameron Street
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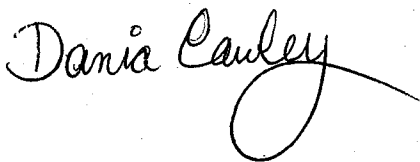
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Sincerely,

Dania Cawley

A handwritten signature in cursive script that reads "Dania Cawley". The signature is written in dark ink and is positioned below the typed name.

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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Carla Morrone

Bureau of Dog Law Enforcement
Pennsylvania Department of Agriculture
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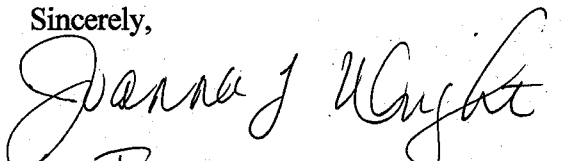
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JOANNA L. WRIGHT

Bureau of Dog Law Enforcement
Pennsylvania Department of Agriculture
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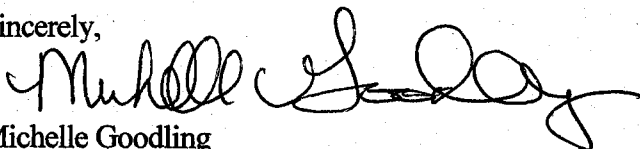
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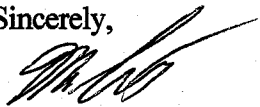
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43 Heffner Drive
Sinking Spring, Pa. 19608-9128

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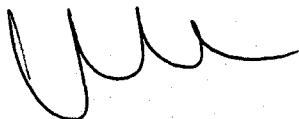
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MICHAEL IPPOLITI
628 KATER ST.
PHILA PA 19147

MaryAnne Wesdock
213 Second Street
Pittsburgh, PA 15215
February 5, 2007

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

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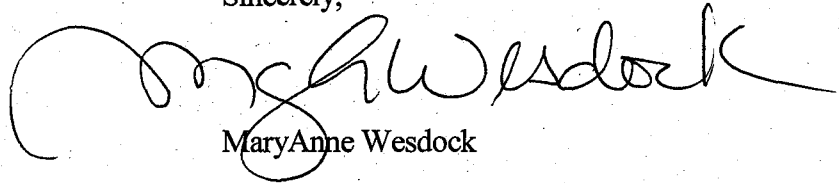
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A handwritten signature in black ink, appearing to read 'MaryAnne Wesdock'. The signature is fluid and cursive, with a large initial 'M' and 'W'.

MaryAnne Wesdock

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

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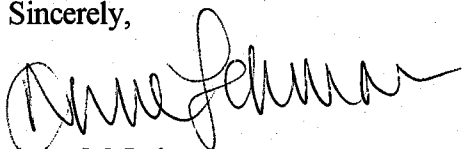
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Anne M. Lehman



Jeff & Patti Hubert
1278 Chestnut Street
Monaca PA 15061
(724) 728-7744

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

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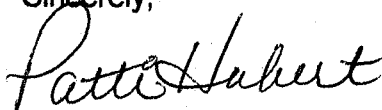
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Patti Hubert

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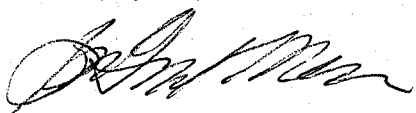
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Bureau of Dog Law Enforcement
Pennsylvania Department of Agriculture
Attn: Ms. Mary Bender
2301 North Cameron Street
Harrisburg, PA 17110-9408

February 2, 2007

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Sincerely,

Jerry Young
26 Cobble Hill
Media Pa 19063

SHIRLEY A. JOHNSON
P.O. Box 75
Skippack, PA 19474

February 5, 2007

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

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Shirley A. Johnson

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

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Karen Keefe

Karen Keefe
405 Spurzheim St.
Shamokin, PA 17872

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Pennsylvania Department of Agriculture
Attn: Ms. Mary Bender
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Donna E. Brunell
415 N 4th Street, Halifax, PA 17032

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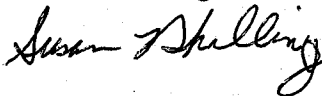
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Sincerely,
Susan L. Shilling



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

February 5, 2007

RE: Comments on proposed Dog Law regulations

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Mark Myers
235 Avon Rd.
Springfield, PA 19064

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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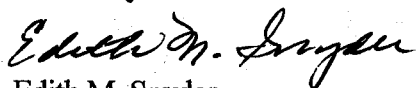
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Edith M. Snyder

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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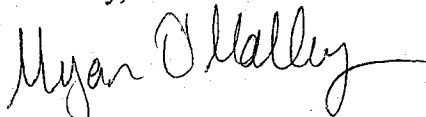
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Sincerely,

A handwritten signature in cursive script that reads "Megan O'Malley". The signature is written in black ink and is positioned above the printed name.

Megan O'Malley

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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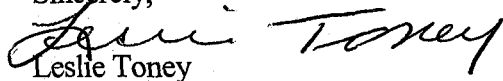
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Leslie Toney

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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Nick Kachmar
305 Kelton Place

Cranberry Twp., PA 16066

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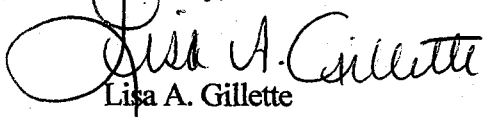
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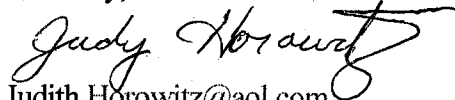
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Judith Horowitz@aol.com

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Wynnewood, PA. 19096

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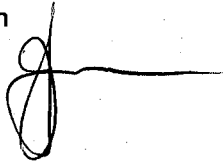
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Jason Lehman

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

[Lisa Fiedler
3129 Bradbury Dr.
Aliquippa, PA 15001]

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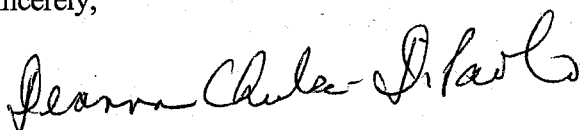
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Seanna Chuba DiPaolo
243 Peter St.
Duquesne, PA 15110

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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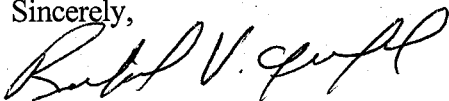
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RICHARD VERNON GROFF
305 PERRY AVENUE
LANCASTER, PA 17603
(717) 397-1464

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

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Bethany Batson

1850 Stoneridge Lane
Villanova, PA 19085
February 5, 2007

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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Deborah Robbins

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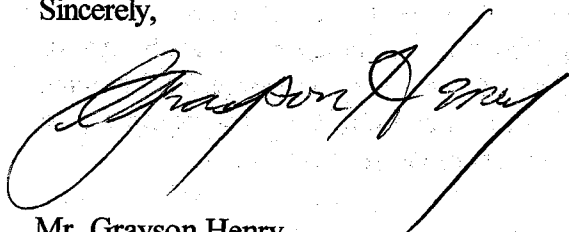
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Mr. Grayson Henry
643 Creek Road
Warminster, PA 18974-1109

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Sincerely,


Margaret Jo Kucek

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,

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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.

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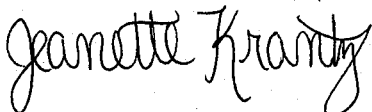
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Sincerely,

Jeanette Krantz

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

2559

RECEIVED

Kathy Cooper

From: MONICA MICHELENA [michelenam@msn.com]

2007 FEB 20 PM 2:45

Sent: Sunday, February 18, 2007 7:51 PM**To:** IRRCINDEPENDENT REGULATORY
REVIEW COMMISSION**Subject:** Comments on proposed Dog Law regulations

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

February 13, 2007

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2/20/2007

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Sincerely,

Monica Michelena
1483 First Avenue, 3H
New York, NY 10021

41 Black Oak Drive
Lancaster, PA 17602
February 5, 2007

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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A handwritten signature in cursive script, appearing to read "Kris Harker".

(Mr.) Kris Harker

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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Patty Loo

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

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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,

Karen Waltman

Karen Waltman

Thanks for your time! I appreciate
your concern in this matter.

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

February 5, 2007

RE: Comments on proposed Dog Law regulations

Dear Ms. Bender,


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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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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.

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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.

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VALERIE PALATINUS
290 E. SWAMP ROAD
DOYLESTOWN, PA 18901
vpalatinus@netzero.com

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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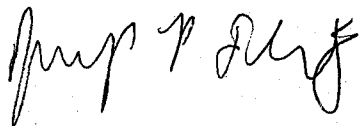
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Joseph P. Flaherty
31 Greenvue Drive
McKees Rocks PA 15136

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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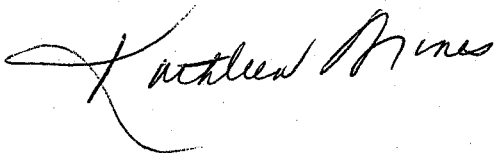
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Ms. Kathy Mines
111 E 9th Ave
Conshohocken PA 19428

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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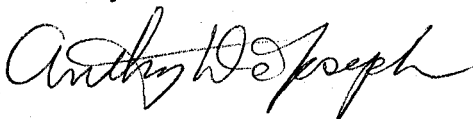
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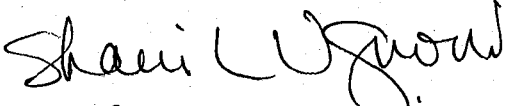
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Shari L Vagnoni

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

February 5, 2007

RE: Comments on proposed Dog Law regulations

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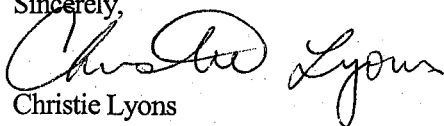
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Christie Lyons
1009 Wharton Street
Philadelphia, PA 19147

CC: Arthur Coccodrilli, Independent Regulatory Review Commission

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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Andrea Maikovich

Derek Fong

Andrea Maikovich and Derek Fong
23 S. 23rd St. #2E
Philadelphia, PA 19103

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

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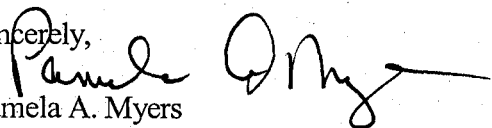
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Pamela A. Myers

235 Avon Rd.

Springfield, PA 19064

Bureau of Dog Law Enforcement
Pennsylvania Department of Agriculture
Attn: Ms. Mary Bender
2301 North Cameron Street
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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,


Nancy Shaeffer
635 South York Road
Hatboro, PA 19040
215-674-2319

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.

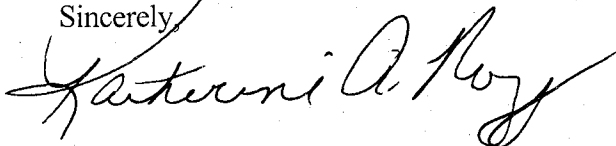
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Sincerely,



Katherine A. Nagy

PO Box 167
Stockdale PA 15483