

2559

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2007 MAR 19 AM 11: 01

INDEPENDENT REGULATORY  
REVIEW COMMISSION

866 Amber Lane  
West Chester, PA 19382  
March 12, 2007

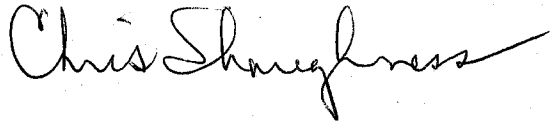
Arthur Coccodrilli, Chairman  
Independent Regulatory Review Commission  
333 Market Street, 14th Floor  
Harrisburg, PA 17101

Dear Mr. Coccodrilli,

The reputation of Pennsylvania as the Puppy Mill Capital of the East is disgraceful. The atrocities placed upon dogs to make a profit should be an embarrassment for our government. You now have the opportunity to do the right thing. Please ensure that the new dog laws are passed, however, it is important for shelters and rescues to be exempted from the kennel expansion and exercise requirements. Also, please exempt foster homes from the kennel housing requirements, giving them separate performance standards appropriate for home care.

Thank you for helping the animals who cannot speak for themselves.

Sincerely,

A handwritten signature in cursive script that reads "Chris Shaughness".

Christine P. Shaughness

2559

205 Chan Mowr Drive  
Valencia, PA 16059  
March 14, 2007

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2007 MAR 19 AM 11:01

INDEPENDENT REGULATORY  
REVIEW COMMISSION

Chairman of the Independent Regulatory Review Committee (IRRC)  
Arthur Coccodrilli  
333 Market Street, 14th Floor  
Harrisburg, PA 17101

Dear Chairman Coccodrilli,

I am writing to ask two things related to the changes Governor Rendell has proposed to the dog law regulations.

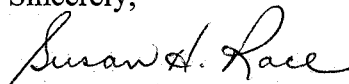
Non-profit animal welfare groups are not in the same category as the people doing the kinds of things which these legislative changes are meant to address. They are the organizations which struggle to deal with the "animal fallout" created by such people. As such, their employees and board members have a clearer picture than most of many of the things involved in the issues relevant to these regulations.

Please make sure that:

1. The Dog Law regulations as applied to kennels should exempt all non-profit animal welfare and rescue organizations, especially non-kennel-based rescues and fosters. These life-saving groups are organized specifically to save and care for the dogs who are given up by their new families because of sickness and genetic disorders caused by bad breeding practices.
2. Representatives from non-profit animal welfare and rescue groups should be included on the Dog Law Advisory Board to better represent the interests of animals in forming these regulations.

Sincere thanks to Governor Rendell for his commitment to change the situation for puppy mill animals in Pennsylvania.

Sincerely,



Susan H. Race

From:  
Betsy Crouse  
5513 Bauer Drive  
Gibsonia, PA 15044

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2007 MAR 19 AM 11: 01

INDEPENDENT REGULATORY  
REVIEW COMMISSION

To:  
Chairman of the Independent Regulatory Review Committee (IRRC)  
Arthur Coccodrilli  
333 Market Street, 14th Floor  
Harrisburg, PA 17101  
Main Telephone: (717) 783-5417

March 13, 2007

Dear Chairman Coccodrilli,

I am writing to ask two things related to the changes Governor Rendell has proposed to the dog law regulations:

1. The Dog Law regulations as applied to kennels should exempt all non-profit animal welfare and rescue organizations, especially non-kennel-based rescues and fosters. These life-saving groups are organized specifically to save and care for the dogs who are given up by their new families because of sickness and genetic disorders caused by bad breeding practices.
2. Representatives from non-profit animal welfare and rescue groups should be included on the Dog Law Advisory Board to better represent the interests of animals in forming these regulations.

I have worked in animal shelters and currently work for a non-profit animal welfare group focused on increasing access to low-cost spay/neuter services for companion animals. Non-profit animal welfare groups are not in the same category as the people doing the kinds of things which these legislative changes are meant to address – they are the organizations which struggle to deal with the “animal fallout” created by such people. As such, their employees and board members have a clearer picture than most of many of the things involved in the issues relevant to these regulations.

Sincerely,

*Betsy Crouse*

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2007 MAR 19 AM 11:05

INDEPENDENT REGULATORY  
REVIEW COMMISSION

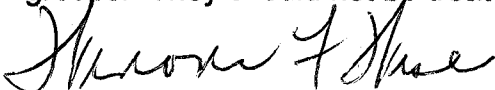
Chairman of the Independent Regulatory Review Committee (IRRC):

Arthur Coccodrilli,  
333 Market Street, 14th Floor  
Harrisburg, PA 17101  
Main Telephone: (717) 783-5417  
Fax: (717) 783-2664  
Email: [irrc@irrc.state.pa.us](mailto:irrc@irrc.state.pa.us)

I appreciate the efforts to stop the problem of puppy mills. I abhor any mistreatment of animals and want to see this stopped. Having said that I believe that the following amendments should be made to the existing proposal.

1. The Dog Law regulations as applied to kennels should exempt all non-profit animal welfare and rescue organizations, especially non-kennel-based rescues and fosters. These life-saving groups are organized specifically to save and care for the dogs who are given up by their new families because of sickness and genetic disorders caused by bad breeding practices.
2. Representatives from non-profit animal welfare and rescue groups should be included on the Dog Law Advisory Board to better represent the interests of animals in forming these regulations.

Thank you for being part of this important change. Let's all work together to stop this animal abuse but at the same time help the proper animal rescue and welfare groups. They should not be treated the same.



Winona F Wise

420 Avon Place

Philadelphia Pa 19116

[www.winonawise@verizon.net](mailto:www.winonawise@verizon.net)

215 677-5901

2559

Chairman of the Independent Regulatory Review Committee (IRRC):  
Arthur Coccodrilli,  
333 Market Street, 14th Floor  
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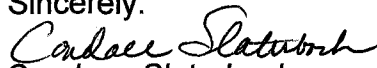
Dear Mr. Coccodrilli,

I am writing to request the following be considered in the fight against the atrocious "Puppy Mills" in Pennsylvania:

1. The Dog Law regulations as applied to kennels should exempt all non-profit animal welfare and rescue organizations, especially non-kennel-based rescues and fosters. These life-saving groups are organized specifically to save and care for the dogs who are given up by their new families because of sickness and genetic disorders caused by bad breeding practices.
2. Representatives from non-profit animal welfare and rescue groups should be included on the Dog Law Advisory Board to better represent the interests of animals in forming these regulations.

I support any laws, procedures, fines or movements to halt this terrible practice.

Sincerely:

  
Candace Slaterback  
Pittsburgh, Pa.

2559

March 14, 2007

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Chairman of the Independent Regulatory Review Committee (IRRC)  
333 Market Street, 14<sup>th</sup> Floor  
Harrisburg, PA 17101

INDEPENDENT REGULATORY  
REVIEW COMMISSION

Dear Mr. Arthur Coccodrilli,

I applaud Governor Ed Rendell and his commitment to cracking down on the puppy mills by proposing changes to dog law regulations. I support Governor Rendell for his efforts and commitment. However, there are some major problems with the new regulations. I hope the governor will work with local non-profit rescue and foster groups to address these problems.

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

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

Thank you for being a part of this important change.

Sincerely,



Cindy Lichtstein  
239 Stauffer Road  
Pottstown, PA 19465

14 Ableview Drive  
Butler, PA 16001-1149  
March 14, 2007

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INDEPENDENT REGULATORY  
REVIEW COMMISSION

Chairman of the Independent Regulatory Review Committee (IRRC)  
Arthur Coccodrilli  
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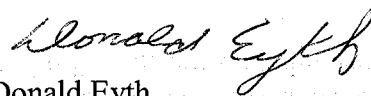
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Please make sure that:

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

Sincere thanks to Governor Rendell for his commitment to change the situation for puppy mill animals in Pennsylvania.

Sincerely,



Donald Eyth

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To:  
Chairman of the Independent Regulatory Review Committee (IRRC)  
Arthur Coccodrilli  
333 Market Street, 14th Floor  
Harrisburg, PA 17101  
Main Telephone: (717) 783-5417

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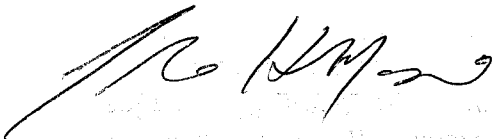
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Sincere thanks to Governor Rendell for his commitment to change the situation for puppy mill animals in Pennsylvania.

Sincerely,



To:

Chairman of the Independent Regulatory Review Committee (IRRC)

Arthur Coccodrilli

333 Market Street, 14th Floor

Harrisburg, PA 17101

Main Telephone: (717) 783-5417

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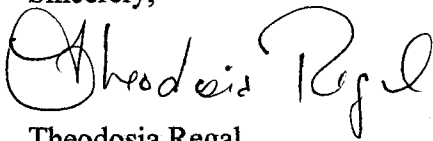
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2. Representatives from non-profit animal welfare and rescue groups should be included on the Dog Law Advisory Board to better represent the interests of animals in forming these regulations.

Sincere thanks to Governor Rendell for his commitment to change the situation for puppy mill animals in Pennsylvania.

Sincerely,



Theodosia Regal

140 Remil Drive

Butler, PA 16001-2625

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Chairman of the Independent Regulatory Review Committee (IRRC)

Arthur Coccodrilli

333 Market Street, 14th Floor

Harrisburg, PA 17101

Main Telephone: (717) 783-5417

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

Sincere thanks to Governor Rendell for his commitment to change the situation for puppy mill animals in Pennsylvania.

Sincerely,



Mary Gamble

4311 Bakerstown-Culmerville Road

Gibsonia, PA 15044

mgamble@nauticom.net

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2007 MAR 19 AM 11:00

March 14, 2007

Chairman of the Independent Regulatory Review Committee (IRRC)  
Attn: Mr. Arthur Coccodrilli,  
333 Market Street, 14th Floor  
Harrisburg, PA 17101

INDEPENDENT REGULATORY  
REVIEW COMMISSION

**Re: Cracking down on Puppy Mills in Pennsylvania**

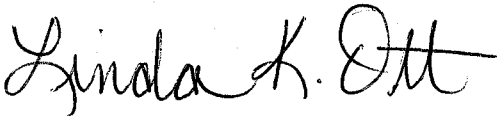
Dear Mr. Coccodrilli:

Please note that I *support and applaud* Governor Rendell for his commitment to the problem of puppy mills in Pennsylvania, but there are some major problems with the new regulations. I hope the governor will work with Best Friends Animal Society and local non-profit rescue and foster groups to address these problems.

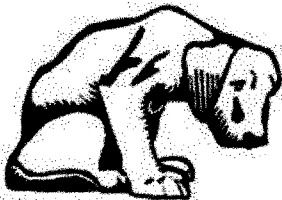
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2. Representatives from non-profit animal welfare and rescue groups should be included on the Dog Law Advisory Board to better represent the interests of animals in forming these regulations.

The conditions of these puppies are horrific, and they are in desperate need of our help. Please put an end to the inhumane puppy mills in Pennsylvania.

Sincerely,



Linda K. Ott



**Prisoners of Greed**

**Puppymills Breed Misery**

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2007 MAR 19 AM 11:00

Nancy J. Smith  
703 East Ave.  
Erie, PA 16503  
March 14, 16503

INDEPENDENT REGULATORY  
REVIEW COMMISSION

Chairman of the Independent Regulatory Review Committee (IRRC):  
Arthur Coccodrilli,  
333 Market Street, 14th Floor  
Harrisburg, PA 17101  
Main Telephone: (717) 783-5417  
Fax: (717) 783-2664  
Email: [irrc@irrc.state.pa.us](mailto:irrc@irrc.state.pa.us)

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

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

Thank you for your consideration:



Nancy J. Smith

2559

3/15/07

Chairman of the Independent Regulatory Review Committee  
Arthur Coccodrilli  
333 Market Street, 14<sup>th</sup> Floor  
Harrisburg, PA 17101

Mr. Coccodrilli:

I am writing because I want to help the animals that are unfortunately born, kept or sold by Puppy Mills in PA.

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

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

Please help the animals that can not help themselves.

Thank you,

  
Jodi L. May

INDEPENDENT REGULATORY  
REVIEW COMMISSION

2007 MAR 19 AM 11:00

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2559

March 15, 2007

427 Barn Swallow Ln  
Allentown, PA 18104

Chairman of the Independent Regulatory Review Committee (IRRC)  
Arthur Coccodrilli  
333 Market Street, 14th Floor  
Harrisburg, PA 17101

RECEIVED

2007 MAR 19 AM 11:00

INDEPENDENT REGULATORY  
REVIEW COMMISSION

Dear Chairman Coccodrilli,

I am writing to ask two things related to the changes Governor Rendell has proposed to the dog law regulations concerning "puppy mills."

Non-profit animal welfare groups are not in the same category as the people doing the kinds of things which these legislative changes are meant to address.

They are the organizations which struggle to deal with the "animal fallout" created by such people. As such, their employees and board members have a clearer picture than most of many of the things involved in the issues relevant to these regulations.

Please make sure that:

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

Sincere thanks to Governor Rendell for his commitment to change the situation for puppy mill animals in Pennsylvania.

Very truly yours,



Linda L Binde

2559

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INDEPENDENT REGULATORY  
REVIEW COMMISSION

Colleen Campbell  
309 Pleasant Valley Drive  
Souderton, PA. 18964

March 13, 2007

Chairman of the Independent Regulatory Review Committee (IRRC):  
Arthur Coccodrilli,  
333 Market Street, 14th Floor  
Harrisburg, PA 17101

Hello Mr. Coccodrilli ,

I am writing to you because of my concern about what's happening in puppy mills across the country, specifically in my home state of Pennsylvania. As I'm sure you are aware, many Americans still buy their dogs from pet stores. And most pet stores get the dogs from puppy mills – factory farms where thousands upon thousands of mother dogs spend their entire lives in small wire cages giving birth after birth after birth to puppies of every breed.

These puppy mills are **places of horror** – almost entirely unregulated. And the puppies themselves are often sickly and suffering from genetic deformities that only show up when it's too late to take them back to the store. Where do they end up? In our shelters and our broken hearts.

Last fall, Gov. Ed Rendell (D) announced a commitment to cracking down on the puppy mills by proposing changes to dog law regulations. I do support Gov. Rendell for his commitment, but there are some major problems with the new regulations, and it is my hope the governor will work with the Best Friends Animal Society and local non-profit rescue and foster groups to address these problems.

I would like to specifically address:

1. The Dog Law regulations as applied to kennels should exempt all non-profit animal welfare and rescue organizations, especially non-kennel-based rescues and fosters. These life-saving groups are organized specifically to save and care for the dogs who are given up by their new families because of sickness and genetic disorders caused by bad breeding practices.
2. Representatives from non-profit animal welfare and rescue groups should be included on the Dog Law Advisory Board to better represent the interests of animals in forming these regulations.

Thank you very much for your time and consideration on this important matter.

Sincerely,





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.

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Sincerely,

Mary C. Radnich  
331 Meadow St  
Meadville Pa 16335

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

INDEPENDENT REGULATORY  
REVIEW COMMISSION

2007 FEB 15 AM 10:57

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February 2, 2007

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Stephanie Calhoun  
1021 Pine Woods Road  
Jersey Shore, PA 17740

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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*Wicki Collyer*

*Handwritten signature*

Commonwealth of Pennsylvania  
Department of Agriculture  
Bureau of Dog Law Enforcement

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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REVIEW COMMISSION

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(no address)

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PENNSYLVANIA COMMISSION

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FELIX COMMISSION

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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

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REVIEW COMMISSION

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February 2, 2007

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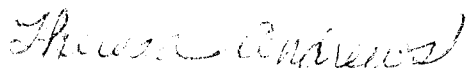
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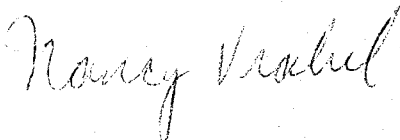
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A handwritten signature in cursive script, reading "Nancy Vrabul". The signature is written in dark ink and is positioned below the typed name "Nancy Vrabul".



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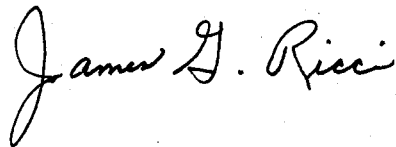
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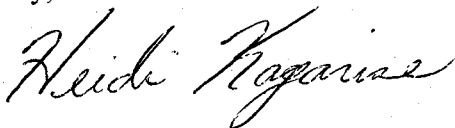
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Sincerely,

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

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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INDEPENDENT REGULATORY  
REVIEW COMMISSION

2007 FEB 15 AM 10:56

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11. Animal hoarders; and
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*Mary Q. Hynes*

Official Use  
Date: Feb 15, 2007  
Time: 10:59 AM

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

INDEPENDENT REGULATORY  
REVIEW COMMISSION

2007 FEB 15 AM 10:59

RECEIVED

February 2, 2007

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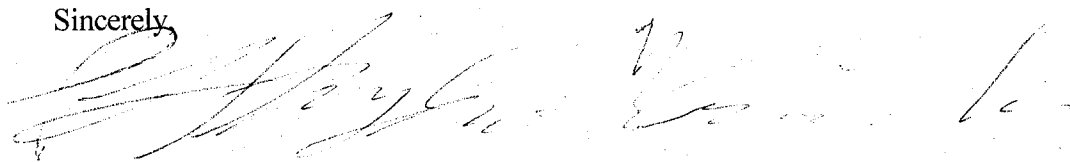
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Sincerely,

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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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INDEPENDENT REGULATORY  
REVIEW COMMISSION

2007 FEB 15 AM 10:59

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*Stasia A. Zaras*

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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INDEPENDENT REGULATORY  
PENNSYLVANIA COMMISSION

2007 FEB 15 AM 10:54

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*Shirley Cavanaugh*

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Pennsylvania Department of Agriculture  
Attn: Ms. Mary Bender  
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*Linda Matous*

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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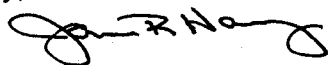
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Museumg, PA 18241-0627

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*J. Cramer*

*Lisa Cramer  
17 Conewago Dr  
Hanover Pa 17331*

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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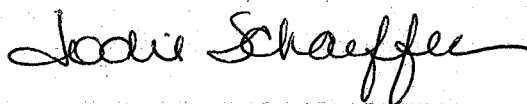
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A handwritten signature in cursive script, reading "Joelle Schaeffer". The signature is written in black ink on a white background.

Bureau of Dog Law Enforcement  
Pennsylvania Department of Agriculture  
Attn: Ms. Mary Bender  
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Bonnie Elizabeth Allen

Bureau of Dog Law Enforcement  
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*Maurice Golden*

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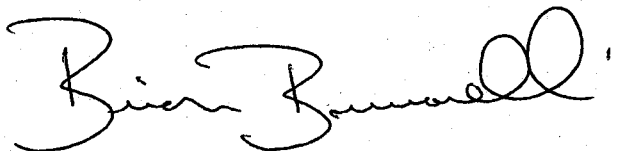
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Sincerely,

A handwritten signature in cursive script, appearing to read "Brian Bunnell". The signature is written in dark ink on a white background.



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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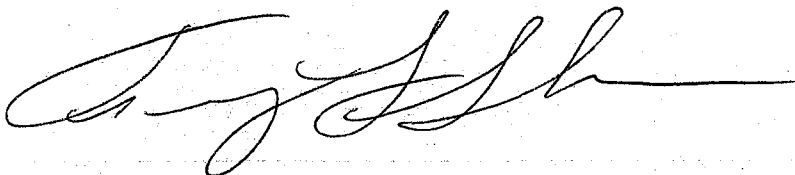
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Sincerely,

A handwritten signature in black ink, appearing to be "T. J. Sh", written in a cursive style.

2559

Mammoth Kennels  
216 Sugar Run Rd  
Avella, PA 15312

RECEIVED

2007 FEB -6 AM 10:45

January 30, 2007

INDEPENDENT REGULATORY  
REVIEW COMMISSION

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.

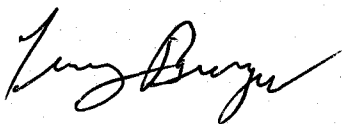
The bureau already requires the name, address, acquisition date, disposition date, type of sale, breed, sex, color, whelping date, and identification number be recorded for each and every dog sold, transferred, adopted, or given away. If the department wishes to enforce the law, they already have all 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,



2559

**Little Bitty Paws Kennel**  
**451 Verla Dr.**  
**Windber, PA 15963**

RECEIVED

2007 FEB -6 AM 10:45

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Attn: Arthur Coccodrilli, Chairman  
333 Market Street, 14<sup>th</sup> Floor  
Harrisburg, PA 17101

INDEPENDENT REGULATORY  
REVIEW COMMISSION

January 31, 2007

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*Patrick Shaffer*  
*Jody Shaffer*

2559

John M Horning  
78 Centennial Road  
Mifflinburg, PA 17844

RECEIVED

2007 FEB -6 AM 10:45

January 19, 2007

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Harrisburg, PA 17101

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*21.14(b) PROHIBITIONS ON DEALING  
WITH UNLISCENCED KENNELS*

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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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Debbie Hanson, 2/5/07

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Kathryn T. Stacy  
465 Sage Drive  
Pittsburgh PA 15243-2011

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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Atiquippa, PA 15001

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519 Delaware Ave.  
N. Versailles, PA 15137

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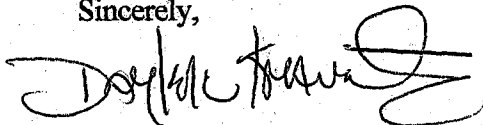
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Christen M. Serdi

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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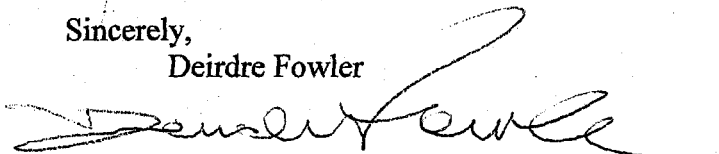
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3307 N Balfour Ave  
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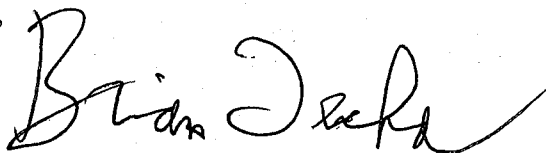
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Pennsylvania Department of Agriculture  
Attn: Ms. Mary Bender  
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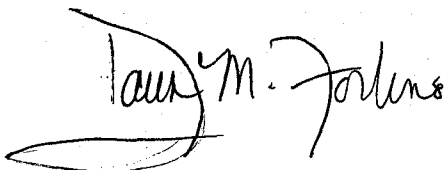
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Sincerely,

A handwritten signature in black ink, reading "Larry M. Jordan". The signature is written in a cursive style with a large, sweeping underline that extends to the left.

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

February 10, 2007

RE: Comments on proposed Dog Law regulations

Dear Ms. Bender,

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

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

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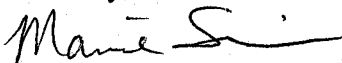
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Sincerely,



Marnie Simmons

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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11. Animal hoarders; and
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Sincerely,

Catherine Cergova  
Larsdale, PA 19446

JOSEPH W. PATTERSON R.N.  
615 ROSELAND AVE  
JENKINTOWN PA 19046

Ms. Mary Bender  
Department of Agriculture  
Bureau of Dog Law Enforcement  
2301 North Cameron Street  
Harrisburg, PA 17110-9408  
February 5, 2007

RE: ID #2-152 (#2559)

Dear Ms Bender:

It has been brought to my attention that the Pennsylvania Dog Law regulations are undergoing revision and that you are soliciting public comment. I am writing to express strong opposition to the current revisions for a number of reasons. While it is admirable and desirable to address the issue of dog abuse and the deplorable conditions of puppy mills, the implementation of the proposed revised regulations (referenced above) would be likely to have nearly the opposite effect.

I sought out a reputable breeder when the time came for our family to add a puppy to our household. This breeder has a well-earned reputation for producing dogs that have achieved international awards, yet this same breeder would be forced to cease her contributions to the breed if these regulations go through. This can't be the intention of the writers of these regulations, yet that's the effect they would have.

Reputable breeders spend vast amounts of time and money in procuring and caring for dogs that are the most exemplary individuals of their breed. While these are often show dogs, receiving training and conditioning and nutrition and health care of the highest order, at the same time these dogs are also companions who share the breeders' home. Under the proposed rules, these loved family members would be required to be housed in nearly industrial conditions. That is probably one of the most unacceptable aspects of these regulations...they essentially condemn dogs to be kept as commercial livestock, without ever feeling the grass beneath their feet or getting to curl up on a couch or play with other dogs. The net effect would be a life of misery for most dogs, regardless of how warm and dry and clean they may be. The breeders who care most for their dogs would be forced out of breeding and showing by the exorbitant costs of compliance with these regulations, leaving the dog-loving public little recourse but to shop for puppies at pet stores, which in turn procure their pups from puppy mills and commercial 'growers' who care nothing for the happiness or welfare of their dogs, regarding them only as commodities capable of generating a profit.

These regulations don't stop with breeders. Boarding kennel operators, groomers, rescue leagues, trainers, veterinarians, search & rescue teams...anyone who cares for more than a handful of dogs would come under the reach of this dangerous precedent. The impact on the economy can't be underestimated; we are a dog-loving culture and the collapse of the small businesses that support the care of our beloved pets would reverberate throughout the Commonwealth.

In an effort to better the conditions for the dogs of our state, much could be accomplished by funding more Dog Law inspectors, more frequent inspections, and expanded education of the public in order to help buyers to locate reputable breeders whose dogs aren't mass-produced with profit as the only incentive to breeding. I appeal to you to rescind these changes.

Sincerely,

*Joseph W. Patterson R.N.*

Ms. Mary Bender  
Department of Agriculture  
Bureau of Dog Law Enforcement  
2301 North Cameron Street  
Harrisburg, PA 17110-9408  
February 5, 2007

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Sincerely,

Patricia Mlenkova



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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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.

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Sincerely,

*Haun Marder*

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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Sincerely,

Janice L. Rydholm  
2349 Adm Lane

Chambersburg, PA. 17201

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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Marilyn D. Chapla

211 Pennock Dr.

Pittsburgh, PA 15235

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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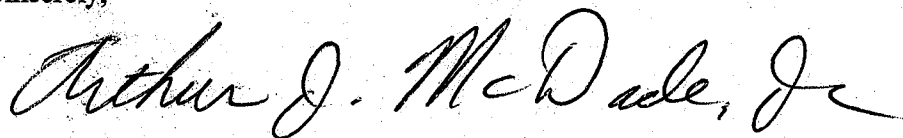
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A handwritten signature in cursive script that reads "Arthur J. McDade, Jr." The signature is written in dark ink and is positioned below the typed name.

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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Bureau of Dog Law Enforcement  
Pennsylvania Department of Agriculture  
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February 2, 2007

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Fred & Liz McLaughlin

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Pennsylvania Department of Agriculture  
Attn: Ms. Mary Bender  
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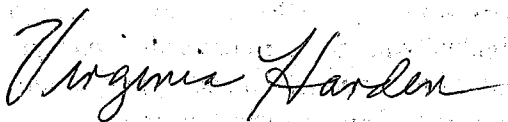
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Sincerely,

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

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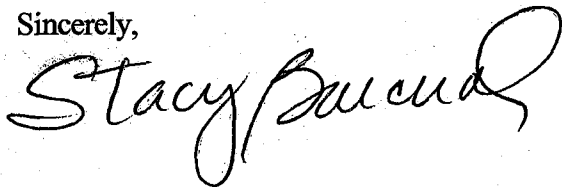
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Bureau of Dog Law Enforcement  
Pennsylvania Department of Agriculture  
Attn: Ms. Mary Bender  
2301 North Cameron Street  
Harrisburg, PA 17110-9408

February 2, 2007

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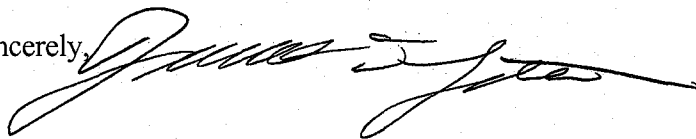
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A handwritten signature in black ink, appearing to read "James J. [unclear]", written in a cursive style.

Angela Santmier  
303 Foxfire Place, #F  
Cockeysville, Maryland 21030

February 5, 2007

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

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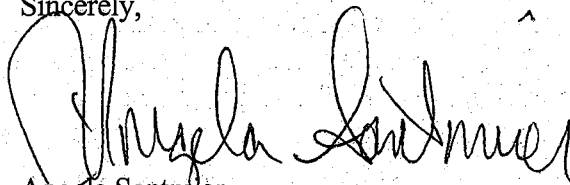
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Pennsylvania Department of Agriculture  
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Sincerely,

Laura A Sellers  
Blakeslee, PA 18610



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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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.

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Sincerely,

The D'Lauro family  
Tom, Annette  
Audrea + Thomas

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,

Lucilia Bloeker

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

February 6, 2007

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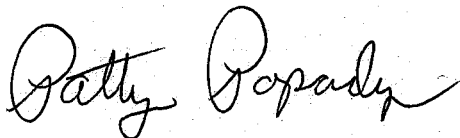
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131 BUCKHILL RD

Pott., PA. 15237

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,

Kathy Bankert

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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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.

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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,

Lila Wilson

Lila Wilson

922 Kimberly Ln

Sevierville, TN 37862

Ms. Mary Bender  
Department of Agriculture  
Bureau of Dog Law Enforcement  
2301 North Cameron Street  
Harrisburg, PA 17110-9408  
February 5, 2007

RE: ID #2-152 (#2559)

Dear Ms Bender:

It has been brought to my attention that the Pennsylvania Dog Law regulations are undergoing revision and that you are soliciting public comment. I am writing to express strong opposition to the current revisions for a number of reasons. While it is admirable and desirable to address the issue of dog abuse and the deplorable conditions of puppy mills, the implementation of the proposed revised regulations (referenced above) would be likely to have nearly the opposite effect.

I sought out a reputable breeder when the time came for our family to add a puppy to our household. This breeder has a well-earned reputation for producing dogs that have achieved international awards, yet this same breeder would be forced to cease her contributions to the breed if these regulations go through. This can't be the intention of the writers of these regulations, yet that's the effect they would have.

Reputable breeders spend vast amounts of time and money in procuring and caring for dogs that are the most exemplary individuals of their breed. While these are often show dogs, receiving training and conditioning and nutrition and health care of the highest order, at the same time these dogs are also companions who share the breeders' home. Under the proposed rules, these loved family members would be required to be housed in nearly industrial conditions. That is probably one of the most unacceptable aspects of these regulations...they essentially condemn dogs to be kept as commercial livestock, without ever feeling the grass beneath their feet or getting to curl up on a couch or play with other dogs. The net effect would be a life of misery for most dogs, regardless of how warm and dry and clean they may be. The breeders who care most for their dogs would be forced out of breeding and showing by the exorbitant costs of compliance with these regulations, leaving the dog-loving public little recourse but to shop for puppies at pet stores, which in turn procure their pups from puppy mills and commercial 'growers' who care nothing for the happiness or welfare of their dogs, regarding them only as commodities capable of generating a profit.

These regulations don't stop with breeders. Boarding kennel operators, groomers, rescue leagues, trainers, veterinarians, search & rescue teams... anyone who cares for more than a handful of dogs would come under the reach of this dangerous precedent. The impact on the economy can't be underestimated; we are a dog-loving culture and the collapse of the small businesses that support the care of our beloved pets would reverberate throughout the Commonwealth.



In an effort to better the conditions for the dogs of our state, much could be accomplished by funding more Dog Law inspectors, more frequent inspections, and expanded education of the public in order to help buyers to locate reputable breeders whose dogs aren't mass-produced with profit as the only incentive to breeding. I appeal to you to rescind these changes.

Sincerely,

Francis A. Ferreroni

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
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Sincerely,

Cherie Inman  
Harry Inman

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,

Kumi Wooten

PANTHER VALLEY KENNELS  
306 WEST FRONT ST  
LANSFORD, PA 18232

2559

RECEIVED

JANUARY 30, 2007

2007 FEB -7 AM 11:16

INDEPENDENT REGULATORY REVIEW COMMISSION  
ATTN: ARTHUR COCCODRILLI, CHAIRMAN  
333 MARKET STREET, 14TH FLOOR  
HARRISBURG, PA 17101

INDEPENDENT REGULATORY  
REVIEW COMMISSION

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,

*Wm J. Krajcinick*



Luke Martin  
7243 Rice Rd  
Shippensburg, PA 17257

January 30, 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 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, and 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,

*Luke R Martin*

Anna Martin  
549 Hahnstown Rd  
Ephrata, PA 17522

January 30, 2007

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Pennsylvania Department of Agriculture  
Attn: Ms. Mary Bender  
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