

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.

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

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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.

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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.

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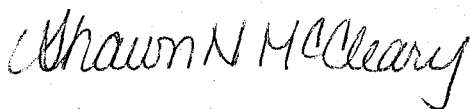
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Shawn N McCleary

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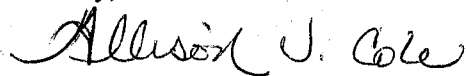
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Allison Cole
137 Moraine Dr.
Portersville, PA 16051
USA

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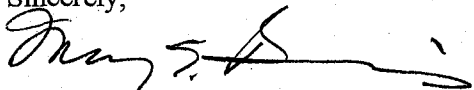
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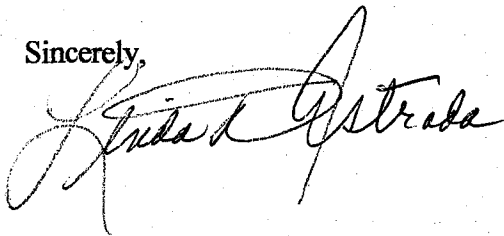
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Nancy Holland
3007 River Rd.
New Hope, PA 18938

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

February 2, 2007

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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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Charlene M. Longacre
4432 Pin Oak Lane
East Greenville, PA 18041

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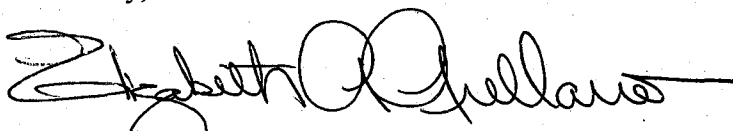
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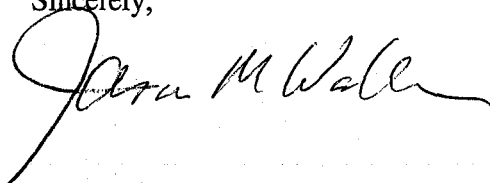
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Bureau of Dog Law Enforcement
Pennsylvania Department of Agriculture
Attn: Ms. Mary Bender
2301 North Cameron Street
Harrisburg, PA 17110-9408

February 2, 2007

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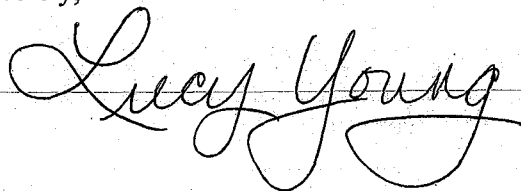
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Bureau of Dog Law Enforcement
Pennsylvania Department of Agriculture
Attn: Ms. Mary Bender
2301 North Cameron Street
Harrisburg, PA 17110-9408

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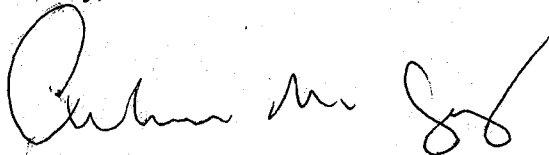
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Bureau of Dog Law Enforcement
Pennsylvania Department of Agriculture
Attn: Ms. Mary Bender
2301 North Cameron Street
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February 2, 2007

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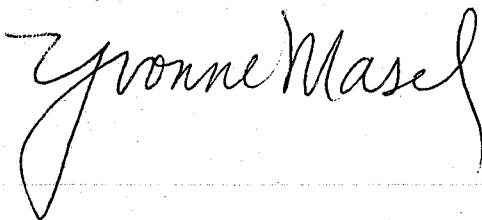
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9. The section on wire mesh flooring should be amended to make it at least as strict as the federal Animal Welfare Act, which requires that metal strand flooring be greater than one-eighth of an inch in diameter (9 gauge) or coated with a material 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,

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

Attachment A

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

February 13, 2007

RE: Comments on Proposed Dog Law Regulations

Dear Ms. Bender,

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.

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

January 30, 2007

Dear Ms. Bender,

I am writing 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.

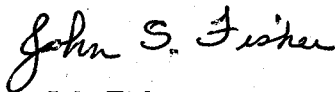
The new proposal only permits a licensed kennel to buy from another licensed kennel. This is fraud for the following reasons:

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,



JohnFisher
74 Londonvale Road
Gordonville, PA 17529

February 4, 2007

4451 Cemetery Rd.
Parkesburg, PA 19365

Mary Bender
Pennsylvania Dept. of Agriculture
2301 N. Cameron St.
Harrisburg, PA 17110

Reference: Proposed Change to PA Dog Law
Docket # 06-2452

Dear Ms. Bender,

I have recently become aware of the proposed regulations to the Pennsylvania Dog Law. I am in favor of humane, responsible treatment of all dogs, and am in favor of actions to limit puppy mills in Pennsylvania, but not at the expense of responsible breeders and small kennel operations.

I have been involved in various aspects of dog ownership for over 35 years. I have done confirmation shows, field trials, breed rescue, and pet therapy work at our local VA hospital. I'm also an avid hunter, a taxpayer, and I vote in every election.

Under the proposed regulations, as I read them, small scale breeders would fall under basically the same regulations as large commercial operations. Licensed breeders with a K1 license would not be permitted to breed, whelp and raise their dogs in their home. This is exactly the environment in which a well socialized, healthy puppy or dog is best raised and nurtured.

In 35 years of dog ownership I have always purchased my dogs from small scale breeders who have carefully selected their breeding stock, done their genetic testing when available, taken exceptional care of their dogs, provided necessary and appropriate veterinary care, and socialized their puppies in their home. I want a dog whose breeder knew the temperament of their dogs. I certainly do not want to buy a puppy from a pet shop or a large, sterile operation that will be required under these regulations.

I want my puppy to come from a small scale operation, home raised, and introduced to all the things my family dog will encounter throughout his life. These puppies are far better socialized and healthy than a dog that has been raised by staff members who spend their time maintaining records of when dogs eat, go to the bathroom, have their water dishes sterilized, and have their mandated 20 minutes of daily exercise in a covered, weather free environment. I want my puppy to know what grass is, know what snow is, and be happy to frolic in my fenced in front yard, not an inexperienced kennel dog without that background.

Having been involved in breed rescue for many years I have personally had to deal with the outcome of these pet shop dogs with no socialization, dogs that never fit into the family surroundings due to lack of early socialization, dogs that do not adapt well or accept training later in life.

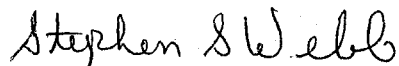
While I applaud efforts to improve the living conditions of all dogs in large scale operations and the infamous puppy mills in Pennsylvania, we need to find a way to do that without putting the small scale breeders out of business. Without these small scale breeders Pennsylvania taxpayers wanting to purchase a dog will unwittingly be force into supporting the very same large scale operations that we are trying to control. Dogs for pet shops will simply be imported from out of state dog brokers like the Hunt Corporation.

I strongly urge you to withdraw these pending regulations until they can be amended to control the real culprits, the large scale operations that breed multiple breeds. The current regulations are onerous, time consuming and not based on current best practices as known to veterinary science. They adversely affect the very type of dog breeder that we should be trying to encourage.

Increased enforcement of the current regulations would go a long way to eliminate the conditions that these regulations are supposed to correct without the immense cost that the new regulations will incur and would allow small scale operations to continue.

I thank you for the opportunity to comment on these proposed regulations and again urge that they **not be** promulgated as currently written.

Sincerely,



Stephen S. Webb

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

January 30, 2007

Dear Ms. Bender,

I am writing 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.

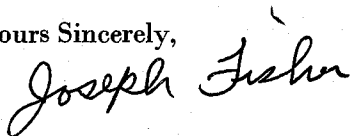
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The current proposal claims to be a general list of ideas to improve the breeding environment for dogs, which are neither substantiated by science nor attributed as accepted canine husbandry practices. A better idea would be for Pennsylvania to adopt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

Yours Sincerely,



Joseph Fisher
74 Londonvale Road
Gordonville, PA 17529

February 8, 2007

Mary Bender
PA Department of Agriculture
2301 North Cameron Street
Harrisburg, PA 17110

Dear Ms. Bender,

I have recently been made aware of the newly proposed PA dog law regulations. I agree that inhumane and substandard care and housing of dogs should not be tolerated but not at the expense of responsible breeders.

Under the proposed changes as I read them, small scale breeders will fall into the same set of requirements as the large commercial operations. Licensed breeders with a K1 license would no longer be able to maintain, breed, whelp and raise their dogs within their homes. As a dog owner in Pennsylvania, I want a dog that was raised in a home environment from breeders who care about the health of their dogs and their temperaments. These small scale breeders will have to either stop raising dogs or begin to build facilities to meet the commercial breeders' standards which is not the way I want a puppy that I'd buy to be raised. The proposed regulations favor the large scale operations that will have the budget to build these "sterile" kennel facilities and to hire staff to maintain the outline record keeping requirements.

I want to be able to buy a dog directly from a reputable breeder, not a pet shop or a large scale commercial kennel. I want to know that my puppy was raised in a loving home and exposed to a variety of household situations. I want to be able to buy a dog that was allowed to play in the grass and to be with other dogs and puppies. This proposal goes against the very nature of the dog as a pack animal and their need to socialize with other dogs and humans.

This effort to improve living conditions for dogs and puppies in large commercial operations/puppy mills is laudable. It is, however, a great disservice to PA dog lovers to place reputable small scale breeders under the same regulations as these larger operations. I strongly oppose these amendments and urge that this proposal be withdrawn.

Sincerely,



Cathy Weglarz
169 Blue Jay Lane
New Columbia, PA 17856

Fax

To: Dog Law Bureau Director Mary Bender
Independent Regulatory Review
Commission

From: Dawn Coppola
Morrisville, PA 19067

Fax: 717.772.4352
717.783.2664

Pages: 1

Phone: 609-734-2363

Date: 2/16/2007

Re: Dept of Agriculture, Dog Law Regs

CC:

Urgent **For Review** **Please Comment** **Please Reply** **Please Recycle**

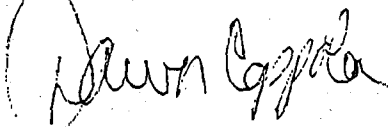
Dog Law Bureau Director, Independent Regulatory Review Commission:

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

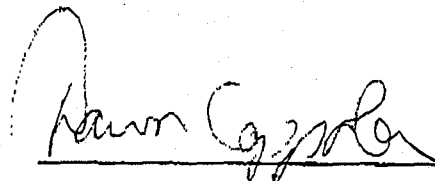
I am strongly opposed to commercial breeding kennels where the costs are minimized by providing substandard care and conditions for the dogs in an effort to increase the profit. I am writing to request that you immediately take steps to address the horrific conditions in commercial kennels in Pennsylvania.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

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

Sincerely,



Dawn Coppola



Fax

To: Dog Law Bureau Director Mary Bender
Independent Regulatory Review
Commission

From: Justine Corboy
60 Saddle Shop Road
Ringoos, Nj 08551

Fax: 717.772.4352
717.783.2664

Pages: 1

Phone: 609-734-2168

Date: 2/16/2007

Re: Dept of Agriculture, Dog Law Regs

CC:

Urgent **For Review** **Please Comment** **Please Reply** **Please Recycle**

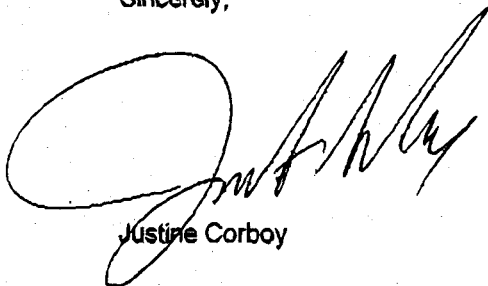
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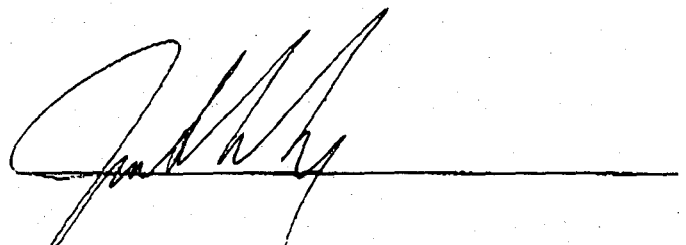
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Sincerely,



Justine Corboy



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.

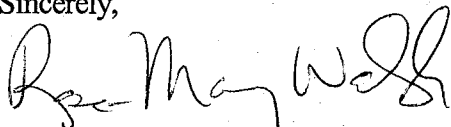
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Once again, I commend the Department of Agriculture and the Bureau of Dog Law Enforcement for proposing regulations that will improve the conditions for dogs housed and bred in Pennsylvania's commercial kennels. The changes I have noted above will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

Sincerely,



Rose-Mary Walsh

Fax: 717-772-4352

**Mary Bender
Dog Law Bureau Director**

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

Every kennel must be required to have a visible, safe source of heat and air-conditioning. Additionally, the regulations should limit the number of dogs that can be kept in one cage. And finally, we ask that you include breeding regulations consistent with those established by reputable breed clubs.

Please take steps to ensure that the new regulations provide humane conditions for the dogs.

**Ray Lee
Kansas**

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DOG LAW ENFORCEMENT
2007

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DOG LAW ENFORCEMENT
2007

FEB 23 2007

Ms Mary Buder

Dog Law Bureau Director, Independent Regulatory Review Commission:

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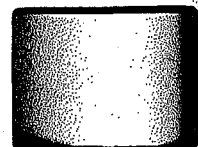
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Patricia A. Milligan

Patricia A. Milligan
PO Box 452
Barnesville MD 20838

301-412-0132

FEB 25 2007



Ms Mary Bender

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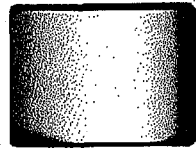
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Patricia A. Milligan

Patricia A. Milligan
PO Box 452
Barnesville MD 20838

301-412-0132

FEB 25 2007



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

February 7th, 2007

RE: Comments on proposed Dog Law regulations

Dear Ms. Bender,

I live in State College, PA and have long been concerned about the state of commercial breeding operations in Pennsylvania. 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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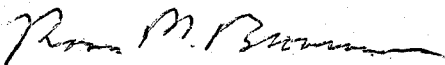
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Ronn M. Brouman
424 Waupelani Drive
Apt. L-24
State College, PA 16801
(814) 360-1617 (Cell)

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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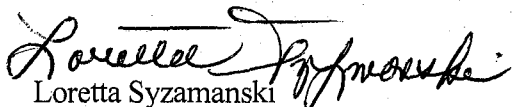
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3728 Liberty Avenue
Pittsburgh PA 15201

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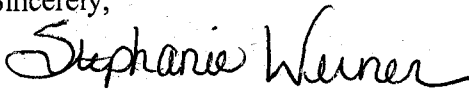
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Pittsburgh PA 15209

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Sincerely,

Rev. Pam Fischer
854 Valley Road
Lancaster, PA 17601



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:

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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.
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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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.

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Sincerely,

Pollyana L. Harmon
email: POLLYSUNG@MSN.COM



Pollyana Harmon
1956 W 230th St.
Torrance, CA 90501

P.S. This is a form letter, but it stated everything the way I feel thanks for your attention!

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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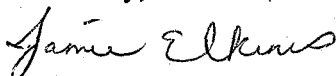
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Jamie Elkins
Hc 82 Box 112B

Spurlockville, WV 25565
(304) 524-2246

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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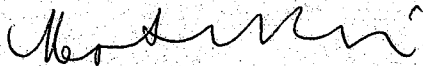
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Kristen S. Cloutier Bourgoin

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

A handwritten signature in black ink, appearing to read 'Krista L. Fletcher', with a large, sweeping flourish underneath.

Krista L. Fletcher

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

February 13, 2007

RE: Comments on proposed Dog Law regulations

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Margaret Donovan
325 East 80th Street
New York, N.Y. 10021

46 West 83rd Street, Apt. 7D
New York, NY 10024-5253
February 18, 2007

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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Sincerely,



Eva-Lynn Podietz

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,

Gabrielle S. Rice

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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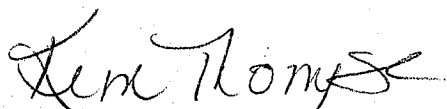
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Sincerely,

A handwritten signature in cursive script, appearing to read "Len Thomas". The signature is written in dark ink and is positioned below the typed name "Len 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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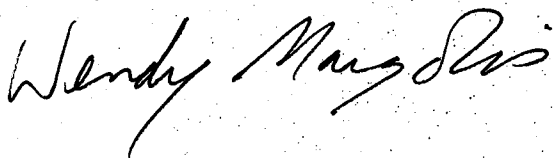
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Sincerely,

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

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,

Katie A. Walck

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,



Krishna Orndoff

183 Shoaf St.

Tarentum PA 15084

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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Sincerely,



Frank B. Brooks, Ph.D.
934 McKnight Road
Indiana, PA 15701

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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Sincerely,



Lisa M Banner
24 Manor Street
Washington Boro, PA 17582

2559

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

RECEIVED

2007 FEB 26 AM 10:12

INDEPENDENT REGULATORY
REVIEW COMMISSION

January 30, 2007

Dear Chairman Coccodrilli,

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

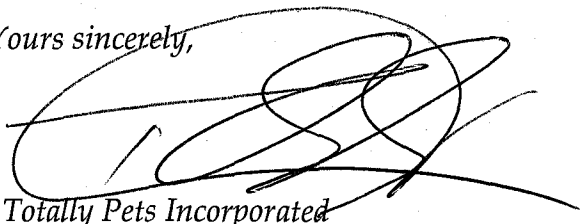
I appreciate that fact that the bureau has helped to improve the dog laws in the past several years. However, the current proposed regulation changes have appeared to be intentionally burdensome and go far beyond mere rulemaking.

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

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

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

Yours sincerely,



Totally Pets Incorporated
7618 City Ave
Philadelphia, PA 19151

Tom Oppendek Pres.

2559

Richard Nolt
401 Stracks Dam Road
Myerstown, PA 17067

RECEIVED

2007 FEB 26 AM 10:12

INDEPENDENT REGULATORY
REVIEW COMMISSION

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,



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

February 6, 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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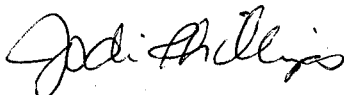
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Sincerely,



Jodi Phillips

Gwendolyn Bye Schulman

1222 N. Woodbine Ave.
Narberth PA 19072

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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Gwendolyn Bye Schulman

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

February 2, 2007

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7. 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,



Diane L. Hobert
Broomall, PA 19008

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.

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Sincerely,
Joann Roberts, *Prof. Emerita, DelVal College*
5981 Pidcock Creek Rd.
New Hope, pa. 18938

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of our dogs. A sign of a civilized society
is in the way it treats all animals.
Please protect our dogs by enforcing the*

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