

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

February 2, 2007

RE: Comments on proposed Dog Law regulations

Dear Ms. Bender,

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

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

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

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

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

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

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

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

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

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

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

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

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

Sincerely,


Judi DiMarco

From:
Ashlee Caul
959 McNeilly Rd.
Pittsburgh, PA 15216
(Mt. Lebanon)

2559

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

RECEIVED
2007 MAR -5 AM 9:15
INDEPENDENT REGULATORY
REVIEW COMMISSION

Cc.
Arthur Coccodrilli, Chairman, Independent Regulatory Review Commission
Hon. Matthew Smith
Sen. Wayne Fontana

Dear Ms. Bender:

I am writing to you to express my support for the proposed changes to kennel regulations in Pennsylvania. These provisions include but are not limited to

- doubling the minimum cage size
- requiring daily exercise outside of the cage
- required heat when the temperature drops below 50 degrees
- required cooling (by fan or air conditioning) when the temperature rises above 85 degrees
- improving ventilation in kennel areas
- denying kennel licenses to individuals convicted of animal cruelty within the past 10 years

I also support the detailed comments submitted on this issue by The Humane Society of the United States.

Please let's end the sometimes horrific and, at the very least, inhumane treatment of the little ones who will someday be someone's beloved pet.

Sincerely,

Ashlee Caul

Ashlee Caul
Mt. Lebanon, Pennsylvania

2559

6026 Goshen Road
Newtown Square, PA 19073
March 2, 2007

Department of Agriculture
Bureau of Dog Law Enforcement
Attn: Mary Bender
2301 North Cameron Street
Harrisburg, PA 17110-9408
(FAX No: 717-772-4352)

INDEPENDENT REGULATORY
REVIEW COMMISSION

2007 MAR -2 PM 4:56

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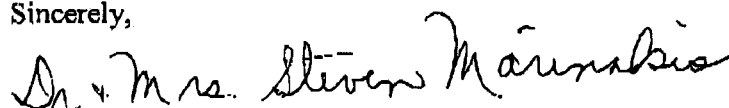
Ladies and Gentlemen:

We are writing to voice our support for major improvements in the regulations used to inspect commercial breeding operations in Pennsylvania. In particular, we approve of the detailed comments submitted by The Humane Society of the United States.

As residents of Pennsylvania, we are ashamed of our state's dubious reputation as "Puppy Mill Capital of the East." These facilities must be inspected regularly, and the mandatory standards of care for animals at commercial breeding operations need to be completely overhauled. Breeders must know that they will be reported AND prosecuted for failure to comply.

Thank you for your attention to our concerns. We can do much better for "man's best friend" in Pennsylvania.

Sincerely,



Dr. & Mrs. Steven Marinakis

cc: Arthur Coccodrilli, Chairman
Independent Regulatory Review Commission
333 Market Street, 14th Floor
Harrisburg, PA 17101
(FAX No: 717-783-2664)

February 22, 2007

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

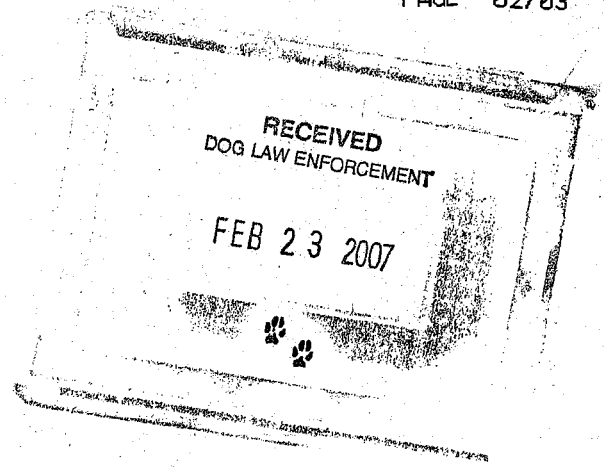
Dear Ms. Bender:

My name is Lee Wlodarczyk and I live at 403 Byron Road in Warminster, PA. I love animals and am currently involved with a dog rescue. I am also friends with an individual who breeds dogs to participate in various shows as well as members of the Pennsylvania Sled Dog Club.

I am writing to comment on the proposed amendments to the Pennsylvania dog law regulations issued on December 16, 2006. I appreciate the state attempting to lessen the dangers of disreputable breeders as well as the inhumane treatment of animals. However, as written, the proposed regulations will put an undue hardship on legitimate rescues and small reputable breeders.

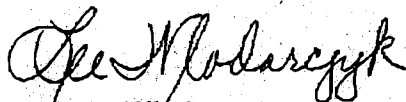
Examples of problems with the proposal include:

- The proposals pertaining to housing and social interaction of dogs of different sizes will hinder rescues in properly evaluating foster dogs as well as limit socialization opportunities. Dog trainers, behaviorists and many studies tout the importance of socialization early and often for dogs.
- The definition of "temporary housing" would require thousands of small residential hobby and show breeding households to become licensed which could not possibly comply with the regulations, and which there is no reason to regulate.
- The regulations will require wholesale renovation, if not rebuilding, of many kennels already built in compliance with current federal and/or state standards. There is no scientific foundation for the arbitrary, rigid engineering standards specified.
- Smaller breeders and dog owners who maintain their dogs in their own residential premises but are covered by the Pennsylvania dog law, who provide care and conditions far superior to those required by the proposed new standards, would be unable to comply with the rigid commercial kennel standards.



The above is far from a complete list of the deficiencies with the proposed regulations. If passed, these regulations will limit rescues in assisting humane societies in saving dogs as they will not be able to meet these standards. In conclusion, I agree that something needs to be done to ensure dogs are well cared for and bred correctly. However, the proposed amendments will serve only to thwart the efforts of rescues and hinder small reputable breeders. I ask that the proposal be withdrawn and the state use their resources to actively enforce the regulations and laws already in place.

Sincerely,



Lee R. Włodarczyk

/lrw

cc: Hon. Bernard T. O'Neill
Hon. Stewart J. Greenleaf

February 20, 2007

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

RE: Adopt bill to change Puppy Mill Regulations

Dear Pennsylvania Bureau of Dog Law Enforcement:

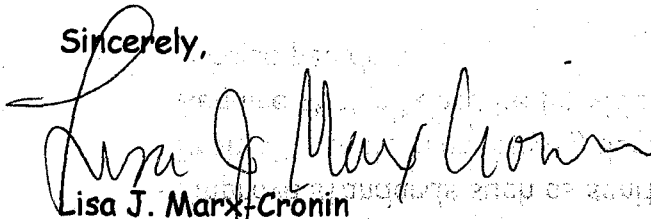
Please pass the bill that will adopt new regulations for the humane treatment of the dogs in Pennsylvania.

Including:

- Double the required cage size for dogs.
- Improve standards such as sanitation, drainage and ventilation.
- Prohibit people from buying dogs from unlicensed dealers.
- Require that all dogs be provided with a minimum of 20 minutes of exercise per day.

I appreciate your interest in this matter and prompt attention to changing the conditions for animals in your state.

Sincerely,



Lisa J. Marx-Cronin

326 W. Orchard Avenue

Lebanon, OH 45036

February 12, 2007

819 Radclyffe Street
Bethlehem, PA 18017

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

Dear Ms. Bender:

As a concerned constituent, I am writing to urge you to support the proposed amendments to the Dog Law regulations set forth by the Department of Agriculture and the Bureau of Dog Law Enforcement.

Pennsylvania has developed a (not altogether undeserved) reputation as the "Puppy Mill Capital of the East." This reputation is an embarrassment to our state, and it is important that the situation be remedied. The changes to the Dog Law regulations proposed by the Department of Agriculture and Bureau of Dog Law Enforcement will greatly improve the conditions in which dogs are bred and raised commercially in Pennsylvania.

The new regulations will:

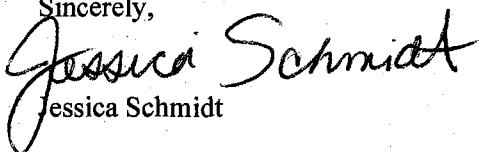
- Double the required cage size for dogs.
- Improve standards such as sanitation, drainage and ventilation.
- Prohibit people from buying dogs from unlicensed dealers.
- Require that all dogs be provided with a minimum of 20 minutes of exercise per day.
- Require prompt and necessary veterinary care for sick and injured dogs.

The proposed regulations will not impose restrictions on small hobby breeders who raise fewer than 26 dogs in a year, contrary to what the breeding industry suggests. Nor will the regulations impact dog shows, dog parks, or other dog events held in the state. The regulations are aimed specifically at regulating large-scale commercial breeders.

It is in the state's best interest to provide humane care and conditions for dogs housed and bred in Pennsylvania's commercial kennels. The proposed regulations will better ensure that these dogs are disease-free, behaviorally sound and well cared for. As a constituent and a dog lover, I respectfully request that you support the regulations and help move them through the regulatory process in an expeditious manner.

Thank you for your time and consideration.

Sincerely,


Jessica Schmidt

cc: Arthur Cocodrilli, Patrick M. Browne, Lisa M. Boscola, Joseph F. Brennan, Steve Samuelson, Robert Freeman, Craig A. Dally

Erica Mumford
34 Kulp Road East
Chalfont, PA 18914

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

Dear Ms. Bender,

I am writing to express my ardent support for the proposed changes to puppy mills and the more humane regulations being introduced. Such changes can drastically improve the living conditions and lives of dogs who are currently suffering in puppy mills. These changes to the regulations include the following:

- * doubling the minimum cage size
- * requiring daily exercise outside of the cage
- * required heat when the temperature drops below 50 degrees
- * required cooling when the temperature rises above 85 degrees
- * improving ventilation in kennel areas
- * denying kennel licenses to individuals convicted of animal cruelty

However, an exemption is appropriate for shelters and foster homes, which should have alternate performance standards.

Thank-you for your time and help in this critical matter! Hopefully, we can significantly improve the lives of these poor, innocent dogs!

Sincerely,

Erica Mumford

Erica Mumford

February 19, 2007

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

RE: Please Adopt Puppy Mill Regulations

I am writing because Lancaster County, Pennsylvania, has the highest concentration of puppy mills of any county in the United States.

It is to the Pennsylvania Governor's credit that he recently committed to cleaning up the state's commercial dog breeding industry.

Enacting regulations that protect Pennsylvania's kennel dogs from abuse is an important step toward that goal.

The Pennsylvania Department of Agriculture and Bureau of Dog Law Enforcement have introduced changes to the regulations that govern the commercial breeding industry in the state.

Many of these changes are vital if Pennsylvania is to improve conditions for dogs kept in commercial kennels and put an end to the State's ignoble reputation.

If enacted, these new regulations will drastically improve conditions for dogs in commercial breeding facilities in Pennsylvania. The new regulations will:

- Double the required cage size for dogs.
- Improve standards such as sanitation, drainage and ventilation.
- Prohibit people from buying dogs from unlicensed dealers.
- Require that all dogs be provided with a minimum of 20 minutes of exercise per day.

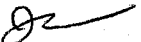
These represent basic minimum care, yet the commercial breeding industry has made a number of inaccurate and potentially damaging statements about the proposed regulations.

The proposed regulations will not impose restrictions on small hobby breeders who raise fewer than 26 dogs in a year; nor will the regulations impact dog shows, dog parks, or other dog events held in the state.

The regulations are aimed specifically at regulating large-scale commercial breeders.

I sincerely thank the Pennsylvania Department of Agriculture and Bureau of Dog Law Enforcement for introducing regulations that could help put an end to some of the inhumane and cruel practices considered "routine" at high-volume dog breeding facilities.

Respectfully,


J. Capozzelli
315 West 90th Street
New York, NY 10024

FEB 19, 2007

BUREAU OF DOG LAW ENFORCEMENT
PENNSYLVANIA DEPT OF AGRICULTURE
ATT MS. MARY BENDER
2301 N CAMERON ST
HARRISBURG, PA 17110-9408

Ms. Mary Bender,

Federal: Urge the Pennsylvania Bureau of Dog Law Enforcement to Adopt Puppy Mill Regulations!

Bill Number: Proposed changes to the Dog Law Regulations

Primary Sponsor(s): PA Department of Agriculture and Bureau of Dog Law Enforcement

ASPCA Position: Support, with comments

Lancaster County, Pennsylvania, has the highest concentration of puppy mills of any county in the United States! Pennsylvania's governor recently committed to cleaning up the state's commercial dog breeding industry. Enacting regulations that protect Pennsylvania's kennel dogs from abuse is an important step toward that goal.

The Pennsylvania Department of Agriculture and Bureau of Dog Law Enforcement have introduced changes to the regulations that govern the commercial breeding industry in the state. Many of these changes are vital if Pennsylvania is to improve conditions for dogs kept in commercial kennels and put an end to the State's reputation as the "Puppy Mill Capital of the East."

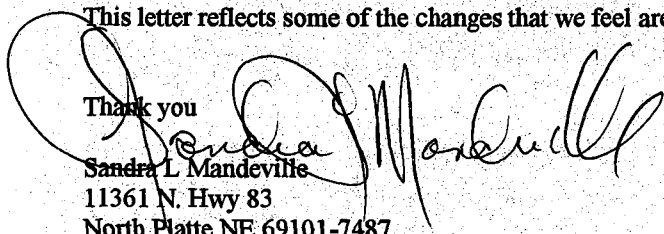
These new regulations, if enacted, will drastically improve conditions for dogs in commercial breeding facilities in Pennsylvania. The new regulations will:

- Double the required cage size for dogs.
- Improve standards such as sanitation, drainage and ventilation.
- Prohibit people from buying dogs from unlicensed dealers.
- Require that all dogs be provided with a minimum of 20 minutes of exercise per day.

The commercial breeding industry has made a number of inaccurate and potentially damaging statements about the proposed regulations. The proposed regulations will not impose restrictions on small hobby breeders who raise fewer than 26 dogs in a year; nor will the regulations impact dog shows, dog parks, or other dog events held in the state. The regulations are aimed specifically at regulating large scale commercial breeders.

This letter reflects some of the changes that we feel are most important.

Thank you


Sandra L. Mandeville
11361 N. Hwy 83
North Platte NE 69101-7487

2/20/07

RE: Bill Number: Proposed changes to the Dog Law Regulations
Primary Sponsor(s): PA Department of Agriculture and Bureau of Dog Law Enforcement

Dear Ms Bender,

It is a VERY SAD fact, that Lancaster County, Pennsylvania, has the highest concentration of PUPPY MILLS of any county in the United States! Pennsylvania's Governor recently committed to cleaning up the State's commercial dog breeding industry. Enacting regulations that protect Pennsylvania's kennel dogs from abuse is an important step toward that goal.

The Pennsylvania Department of Agriculture and Bureau of Dog Law Enforcement have introduced changes to the regulations that govern the commercial breeding industry in the state. Many of these changes are vital if Pennsylvania is to improve conditions for dogs kept in commercial kennels and put an end to the State's reputation as the "Puppy Mill Capital of the East."

These new regulations, if enacted, will drastically improve conditions for dogs in commercial breeding facilities in Pennsylvania. The new regulations will:

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- Require that all dogs be provided with a minimum of 20 minutes of exercise per day.

The commercial breeding industry has made a number of inaccurate and potentially damaging statements about the proposed regulations. The proposed regulations **will not** impose restrictions on small hobby breeders who raise fewer than 26 dogs in a year; nor will the regulations impact dog shows, dog parks, or other dog events held in the state. The regulations are aimed specifically at regulating large scale commercial breeders. **THANK YOU FOR YOUR CONSIDERATION - and I TRULY HOPE that these NEW REGULATIONS WILL BE ENACTED.**

Sincerely,



Rebecca Gemmill, 101 Sandy Bottom Dr., Hardyville, VA 23070



THE AMERICAN SOCIETY FOR THE PREVENTION OF CRUELTY TO ANIMALS®

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Federal: Urge the Pennsylvania Bureau of Dog Law Enforcement to Adopt Puppy Mill Regulations!

Our Programs:

- Disaster Preparedness
- Shelter Outreach
- Animal Poison Control
- Animal Behavior Center
- Equine Program
- Humane Education
- For Kids: ASPCA Animaland
- New York City

Bill Number: Proposed changes to the Dog Law Regulations

Primary Sponsor(s): PA Department of Agriculture and Bureau of Dog Law Enforcement

ASPCA Position: Support, with comments

Action Needed: Make the changes to the regulations even better by taking advantage of the "comment period" that's part of this process. **Print, sign and send a letter** to Pennsylvania's Dog Law Advisory Board urging them to adopt the proposed changes to Dog Law regulations.

Lancaster County, Pennsylvania, has the highest concentration of puppy mills of any county in the United States! Pennsylvania's governor recently committed to cleaning up the state's commercial dog breeding industry. Enacting regulations that protect Pennsylvania's ke dogs from abuse is an important step toward that goal.

The Pennsylvania Department of Agriculture and Bureau of Dog Law Enforcement have introduced changes to the regulations that govern the commercial breeding industry in the state. Many of these changes are vital if Pennsylvania is to improve conditions for dogs in commercial kennels and put an end to the State's reputation as the "Puppy Mill Capital of the East."

These new regulations, if enacted, will drastically improve conditions for dogs in commercial breeding facilities in Pennsylvania. The new regulations will:

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The commercial breeding industry has made a number of inaccurate and potentially damaging statements about the proposed regulations. The proposed regulations **will not** impose restrictions on small hobby breeders who raise fewer than 26 dogs in a year; **nor** will the regulations impact dog shows, dog parks, or other dog events held in the state. **They**

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regulations are aimed specifically at regulating large scale commercial breeders.

It is crucial that the Bureau of Dog Law Enforcement hear from you by March to refute the breeding industry's false assertions.

Please take action now by printing this letter (Download: [Word Document](#) | [PDF Text](#)) and sending it to the Bureau of Dog Law Enforcement! The letter is an official comment on the proposed regulations. The ASPCA supports the regulations, but there are things that could be added and amended to strengthen the regulations and better protect dogs at commercial breeding facilities in Pennsylvania. This letter reflects some of the changes that we feel are most important.

The Bureau must receive your comments by March 16th. Unfortunately, the Bureau is accepting letters through the U.S. Postal Service, so the ASPCA cannot send the letter to you via email. **Please ask friends and family to send a letter as well!**

Send the letter to:

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

Angela D'ATRI
Angela D'atri
Feb. 22, 2007

Jo Ann Thorup
402 Westgate Boulevard
Murfreesboro, TN 37128
(615) 243-4936

February 19, 2007

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

RE: Proposed changes to the Dog Law Regulations

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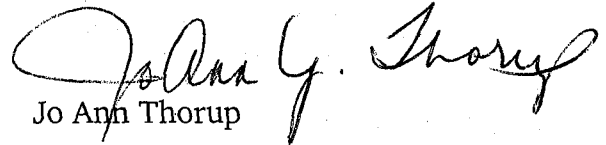
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Bureau of Dog Law Enforcement
Pennsylvania Dept. of Agriculture
Page Two
February 19, 2007

I implore you to adopt the proposed changes to the Dog Law regulations – this is an opportunity to “do the right thing” and take a small step to help alleviate needless exploitation and suffering.

Sincerely,


Jo Ann Thorup

/jat



THE AMERICAN SOCIETY FOR THE PREVENTION OF CRUELTY TO ANIMALS

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TAKE ACTION

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Federal: Urge the Pennsylvania Bureau of Dog Law Enforcement to Adopt Puppy Mill Regulations!

- Our Programs:
- Disaster Preparedness
 - Shelter Outreach
 - Animal Poison Control
 - Animal Behavior Center
 - Equine Program
 - Humane Education
 - For Kids: ASPCA Animaland
 - New York City

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Send the letter to:

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

Eleanor Adiel

7167 deMedici Circle

Delray Beach FL 33446

February 19, 2007

Bureau of Dog Law Enforcement

2301 N. Cameron Street

Harrisburg PA 171110

Dear Madam/Sir:

Lancaster County, Pennsylvania, has the highest concentration of puppy mills of any county in the United States! Pennsylvania's governor recently committed to cleaning up the state's commercial dog breeding industry. Enacting regulations that protect Pennsylvania's kennel dogs from abuse is an important step toward that goal.

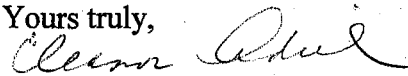
The Pennsylvania Department of Agriculture and Bureau of Dog Law Enforcement have introduced changes to the regulations that govern the commercial breeding industry in the state. Many of these changes are vital if Pennsylvania is to improve conditions for dogs kept in commercial kennels and put an end to the State's reputation as the "Puppy Mill Capital of the East."

These new regulations, if enacted, will drastically improve conditions for dogs in commercial breeding facilities in Pennsylvania. The new regulations will:

- Double the required cage size for dogs.
- Improve standards such as sanitation, drainage and ventilation.
- Prohibit people from buying dogs from unlicensed dealers.
- Require that all dogs be provided with a minimum of 20 minutes of exercise per day.

The commercial breeding industry has made a number of inaccurate and potentially damaging statements about the proposed regulations. The proposed regulations **will not** impose restrictions on small hobby breeders who raise fewer than 26 dogs in a year; nor will the regulations impact dog shows, dog parks, or other dog events held in the state. The regulations are aimed specifically at regulating large scale commercial breeders. It is essential that improvements be required by law and that enforcement be firm.

Yours truly,


Eleanor Adiel

February 19, 2007

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

RE: Proposed changes to the Dog Law Regulations

Dear Ms. Bender:

Lancaster County, PA has the highest concentration of puppy mills of any county in the United States. The Pennsylvania Department of Agriculture and Bureau of Dog Law Enforcement have introduced changes to the regulations that govern the commercial breeding industry in the state. Many of these changes are vital if Pennsylvania is to improve conditions for dogs kept in commercial kennels and put an end to Pennsylvania's reputation as the "Puppy Mill Capital of the East."

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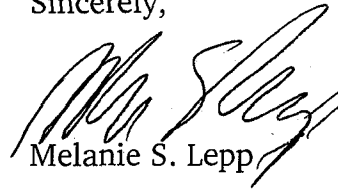
- Double the required cage size for dogs;
- Improve standards such as sanitation, drainage and ventilation;
- Prohibit people from buying dogs from unlicensed dealers; and
- Require that all dogs be provided with a minimum of 20 minutes of exercise per day.

The commercial breeding industry has made a number of inaccurate and potentially damaging statements about the proposed regulations. The proposed regulations will not impose restrictions on small hobby breeders who raise fewer than 26 dogs in a year; nor will the regulations impact dog shows, dog parks, or other dog events held in the state. The regulations are aimed specifically at regulating large scale commercial breeders.

Bureau of Dog Law Enforcement
Pennsylvania Dept. of Agriculture
Page Two
February 19, 2007

I implore you to adopt the proposed changes to the Dog Law regulations – this is an opportunity to “do the right thing” and take a small step to help alleviate needless exploitation and suffering.

Sincerely,

A handwritten signature in black ink, appearing to read 'Melanie S. Lepp', written in a cursive style.

Melanie S. Lepp

MSL/jat

February, 20, 2007

Pennsylvania Bureau of Dog Law Enforcement:

I am writing to plead you to adopt new puppy mill regulations. Having the highest concentration of puppy mills in the United States, I feel it is imperative for Pennsylvania to try to better the conditions of this abusive industry. I was thrilled to hear that the governor recently committed to cleaning up Pennsylvania's commercial dog breeding industry.

These new regulations are an important step towards that goal:

- Double the required cage size for dogs.
- Improve standards such as sanitation, drainage and ventilation.
- Prohibit people from buying dogs from unlicensed dealers.
- Require that all dogs be provided with a minimum of 20 minutes of exercise per day.

From a devoted animal lover, I'd like to thank you for considering these requests. I cringe to think of the innocent creatures in this country that are suffering under inhumane treatment. Hopefully it can be corrected a little bit at a time.

Thank you again,



Christine Silva

New York, NY

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;
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5. State and federal laws relating to pounds and shelters;
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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.

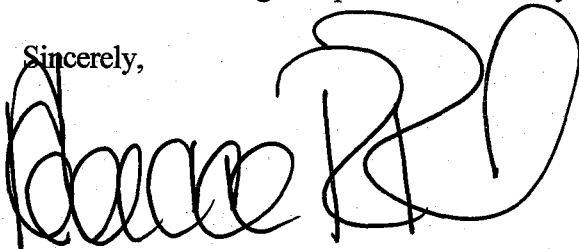
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9. The section on wire mesh flooring should be amended to make it at least as strict as the federal Animal Welfare Act, which requires that metal strand flooring be greater than one-eighth of an inch in diameter (9 gauge) or coated with a material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

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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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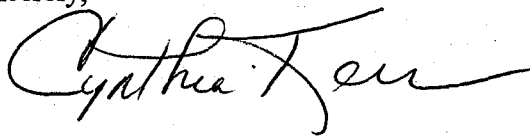
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1043 Mt View Drive
Oua Kertown Pa 18951

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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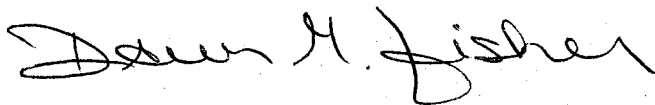
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Sincerely,

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

Bureau of Dog Law Enforcement
Pennsylvania Department of Agriculture

Attn: Ms. Mary Bender
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February 2, 2007

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

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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,

Joanne D. Clark
161 Kidder St.
Wilkes Barre, PA 18702

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

January 27, 2007

Dear Ms. Bender,

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

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

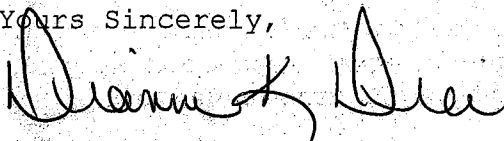
1. Unless the kennel has purchased, sold, or transferred more than 26 dogs in a calendar year to the individual, it is impossible for the kennel to know if the individual is required to have a Pennsylvania kennel license.
2. It is unlawful for the department to regulate and inspect kennels outside of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

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

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

I sincerely request that this proposal be withdrawn.

Yours Sincerely,



Dianna Dice
RD #1, Box 125
Fredericksburg, PA 17026

TO: Dog Law Bureau Director Mary Bender, 717.772.4352
Independent Regulatory Review Commission, 717.783.2664

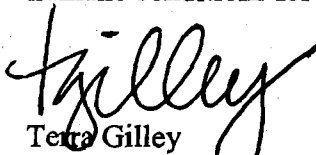
February 9, 2007

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.



Terra Gilley

Guardian of two wonderful pups rescued from inhumane conditions at two separate PA puppy mills

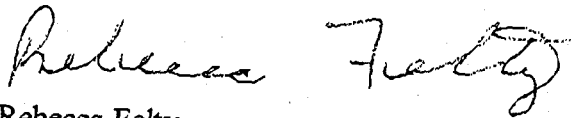
Dog Law Bureau Director, Independent Regulatory Review Commission:

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,

A handwritten signature in cursive script that reads "Rebecca Felty". The signature is written in dark ink and is positioned to the right of the typed name.

Rebecca Felty

Dog Law Bureau Director, Independent Regulatory Review Commission:

Please do lead with integrity. We all need a kinder world.

Pennsylvania should not be renowned for its cruelty for animals. It has much finer qualities as a state.

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

Elizabeth S. Shulman, Ph.D.
877 N Lake Way
Palm Beach, FL 33480

**facsimile
TRANSMITTAL**

To: Dog Law Bureau Director Mary Bender
Fax #: 717.772.4352
Re: Pennsylvania Puppy Mills
Date: February 8, 2007
Pages: 2, including this cover sheet

Thank you for your attention to this important matter.

From the desk of...

Elizabeth Sterenberg Shulman, Ph.D.

Elizabeth Sterenberg Shulman, Ph.D.
377 North Lake Way
Palm Beach, FL 33480

561-655-8033
Fax: 561-655-6650

2320 N. 199th St. West
Colwich, Kansas 67030-8007
February 7, 2007

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

RE: ID #2-152 (#2559)

Dear Ms. Bender:

It has been brought to my attention that the Pennsylvania Dog Law regulations are undergoing revision. As an owner of a dog bred by a reputable Pennsylvania breeder, 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.

My family lives in rural Kansas and considers a Pennsylvania canine to be a loved addition to our home. I sought a reputable breeder when the time came for our family to add a puppy to our household. After a careful nationwide search, I selected a breeder in Pennsylvania. 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, conditioning, 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. One of the most unacceptable aspects of these regulations is that 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, 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 pet stores, which procure their pups from puppy mills and commercial "growers" who care nothing for the happiness or welfare of their dogs, regarding them only as profit generating commodities.

These regulations don't stop with breeders. Anyone who cares for more than a handful of dogs would come under the reach of this dangerous precedent, for example, boarding kennel operators, groomers, rescue leagues, trainers, search & rescue teams, and veterinarians. 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. I, for one, am grateful that

care of our beloved pets would reverberate throughout the Commonwealth. I, for one, am grateful that I had the opportunity to purchase an emotionally and physically healthy puppy from a reputable Pennsylvania breeder and businesswoman. It would be shameful if this opportunity were not available for future canine loving consumers.

In an effort to better the conditions for the dogs of Pennsylvania, 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,

A handwritten signature in cursive script, appearing to read "Karen Rymph Smarsh". The signature is fluid and somewhat stylized, with a large initial "K" and "S".

Karen Rymph Smarsh

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

January 20, 2007

Dear Ms. Bender,

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

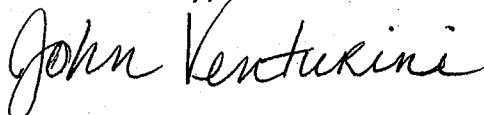
The proposed changes would require the kennel owner to record every time a water bowl or food pan is washed, every time the primary and secondary pen enclosures are cleaned, the feeding and watering dates and times, etc. These excessive and burdensome requirements will require a substantial increase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

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

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

I sincerely urge that this proposal be rescinded.

Yours Sincerely,



*For Pet Lover's Only Pet Shop
730 Milford Road
East Stroudsburg, PA 18301*

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

January 31, 2007

Dear Ms. Bender,

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

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

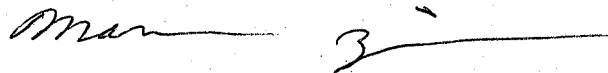
The proposals referencing housing and social interaction of dogs of different sizes are contrary to good husbandry, socializing and training practices. Furthermore, there is no scientific or accepted husbandry basis for the amended space and exercise requirements.

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

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

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

Yours sincerely,



Marun Zimmerman
300 E. Black Creek Rd.
East Earl, PA 17519

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

January 31, 2007

Dear Ms. Bender,

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

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

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

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

Yours truly,

Bridget A. Rhoads



Rhoads Kennel
41 Summer Mountain Road
Bernville, PA 19506

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

January 22, 2007

Dear Ms. Bender,

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

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

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

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

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

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

Yours sincerely, *Cathy Wadel*

Cathy Wadel
24581 Back Rd
Concord, PA 17217

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

January 24, 2007

Dear Ms. Bender,

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

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

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

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

Yours truly,



Planet Pets Plus Quakertown Inc.
117 South West End Blvd.
Quakertown, PA 18951

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

January 24, 2007

Dear Ms. Bender,

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

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

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

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

Yours truly,



Pets Plus Horsham, Inc
200 Blair Mill Rd
Horsham, PA 19044

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

January 22, 2007

Dear Ms. Bender,

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

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

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

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

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

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

Yours sincerely, *Alex Wadel*

Alex Wadel
24581 Back Rd
Concord, PA 17217

(fax) 212 696-9545

Fax

To: Mary Bender Dog Law Bureau
Director

From: M. Markowitz
250 E. 87th Street
New York, NY 10128

Fax: 717.772.4352

Pages:

Phone:

Date:

Re: Commercial Dog Regulations

CC: Independent Regulatory Review
Commission (717.783.2664)

For Review

Please Comment

Please Reply

Please Recycle

Urgent: 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.

February 9, 2007

Dog Law Bureau Director, Independent Regulatory Review Commission:

I am writing this letter to let you know that 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 which are essential and should have been addressed in the first place. The fact that they were not is ridiculous.

I am strongly opposed to commercial breeding kennels where the costs are minimized by providing *disgustingly* below 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.



Katelyn Sullivan

1605 Severn Run Ct.

Severn, MD 21144

443.597.9713

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

February 2, 2007

RE: Comments on proposed Dog Law regulations

Dear Ms. Bender,

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

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

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

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

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

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

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

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

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

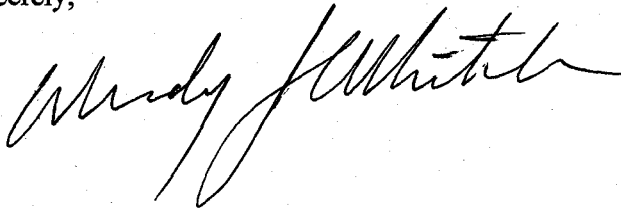
8. Stacking primary enclosures on top of one another should be prohibited. Stacking cages creates an unnatural environment for the dogs. Additionally, it makes observation of the dogs more difficult and creates sanitation problems. Even with a tray or partition between cages, it is likely that the partitions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

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

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

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

Sincerely,

A handwritten signature in cursive script, appearing to read "Wendy J. White". The signature is written in dark ink and is positioned below the typed name "Wendy J. White".

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.

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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,

Judy + Dave Bell

Anne M. Sudzina
1801 Butler Pike, Apt. 185
Conshohocken, PA 19428

February 13, 2007

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

Re: Comments on proposed Dog Law regulations

Dear Ms. Bender:

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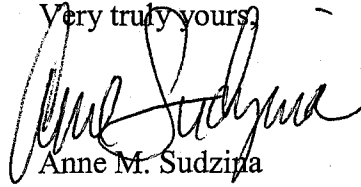
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Once again, I commend the Department of Agriculture and the Bureau of Dog Law Enforcement for proposing regulations that will improve the conditions for dogs housed and bred in Pennsylvania's commercial kennels. The changes I have noted above will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

Very truly yours,

A handwritten signature in black ink, appearing to read "Anne M. Sudzina". The signature is fluid and cursive, with a large initial "A" and "S".

Anne M. Sudzina

*Breezy Hollow Kennel
HCR 61 Box 599B
Mill Creek, PA 17060*

January 31, 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 opposition to the proposed changes to the Dog Law Act 225 which was issued on December 16, 2006. I completely understand that substandard kennel conditions should not be permitted, but most of the proposed regulatory changes are impractical and costly.

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

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

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

The proposed changes would require a substantial increase in manpower with many hours dedicated to filling out written bureaucratic reports and divert the small business owner's time away from caring for their animals.

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

Sincerely,

*Breezy Hollow Kennel
Barbara Ann Peachey*

Maggyver's Loft
470 Seaward Ave.
Bradford, PA 16701

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

January 31, 2007

Dear Ms. Bender,

I am writing 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.

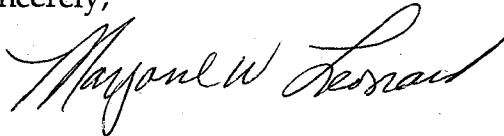
The bureau already requires the name, address, acquisition date, disposition date, type of sale, breed, sex, color, whelping date, and identification number be recorded for each and every dog sold, transferred, adopted, or given away. If the department wishes to enforce the law, they already have all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



*Bricks American Bulldogs
2006 6th Ave.
Beaver Falls, PA 15010*

January 31, 2007

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

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The proposed changes would require a substantial increase in manpower with many hours dedicated to filling out written bureaucratic reports and divert the small business owner's time away from caring for their animals.

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

Sincerely, *Robert C. Buckner*

Mar Mac Kennels
10780 Oliver Rd
Mc Kean, PA 16426

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,

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

Yours Sincerely,

Marion A Macaluso
Mar Mac Kennels

2559

Michelle King
1504 Reading Road
Mohnton, PA 19540

RECEIVED

2007 FEB 26 AM 10:12

January 26, 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.

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

Yours Sincerely,

Michelle A. King

2559

January 24, 2007

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

RECEIVED

2007 FEB 21 AM 10:09

INDEPENDENT REGULATORY
REVIEW COMMISSION

Dear Chairman Coccodrilli,

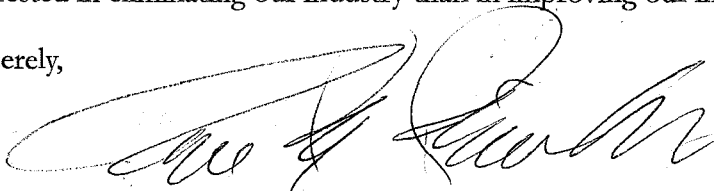
As a Pennsylvania breeder, I am strongly opposed to the overly restrictive rules and regulations that are proposed for kennel owners. The enforcement of regulations such as these will effectively serve to shut down or severely curtail the activities of the concerned, caring and law-abiding breeders in Pennsylvania. The extensive number of regulations outlined in this proposal and the limited time allotted prevents the proper consultation and review of these regulations with our kennel veterinarian and other professionals. Therefore, in order to allow for the proper review and consultation of this extensive proposal, I request a ninety-day extension of the comment period.

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

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

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

Sincerely,



2559

January 24, 2007

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

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INDEPENDENT REGULATORY
REVIEW COMMISSION

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Sincerely,

KH Kennel / Kathy M. Lewis

Nanook Of The North
9478 Rt 6
Kane, PA 16735

2559

RECEIVED

2007 FEB 21 AM 10:09

INDEPENDENT REGULATORY
REVIEW COMMISSION

January 26, 2007

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

Dear Chairman Coccodrilli,

I am writing in response to 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,



Robert W. Mikulski
157 Misty Meadows Road
Mount Pleasant, PA 15666

RECEIVED

2007 FEB 21 AM 10:09

January 23, 2007

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.

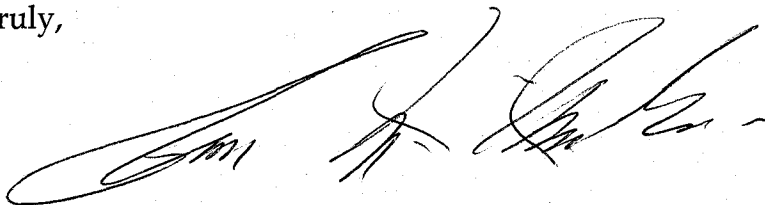
With a full understanding that the bureau is trying to improve substandard kennel conditions, I am not in agreement that most of the changes are necessary.

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,



February 5, 2007

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

Dear Ms. Bender:

I am writing to you in reference to the new legislation being proposed by lawmakers in PA in an effort to improve the living conditions of animals that live in commercial breeding facilities. I would like to applaud your efforts and thank you for your work on behalf of those who have no voice.

I am writing to enthusiastically support this legislation. It is my hope that legislators will not bend to the special interests of groups who are allowing their collective financial self-interest to supercede the overall welfare of the dogs that live in these commercial breeding facilities. As you are well aware, many of these dogs spend **years** living in cramped cages with little or no medical care, no good nutrition, no socialization and no opportunity for regular exercise. It is unfortunate indeed that some turn a blind eye to the suffering of these helpless animals. I fully realize that these are the facilities that this legislation is intended to regulate more effectively.

Once again, I applaud your efforts on behalf of the helpless animals that are suffering in the state of PA at this very moment due to the greed of certain individuals. I hope that you will work tirelessly to see to it that this legislation can be passed and become law. It is my hope that the final legislation will not interfere with the work of shelters and rescues who are already working tirelessly on behalf of animals. That being said, I would like to once again express my support of this legislation.

Most sincerely,

Mrs. Verna Nelson
Donald R. Nelson

February 5, 2007

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Bureau of Dog Law Enforcement
2301 North Cameron Street
Harrisburg, PA 17110-9408

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Most sincerely,

Cheri Miceli

337 Creek Crossing Lane

Chester Springs, PA

19425

February 5, 2007

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Bureau of Dog Law Enforcement
2301 North Cameron Street
Harrisburg, PA 17110-9408

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Most sincerely,

Norman & Marilyn Miller

February 5, 2007

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Most sincerely,

Jan Schanel
Pocono Pet Nanny LLC
Saylorsburg, PA 18353
poconopetnanny.com

February 5, 2007

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2301 North Cameron Street
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Most sincerely,

Cynthia M. Bonfanti
3410 Gato Ave
Harrisburg, Pa 17106

February 5, 2007

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Department of Agriculture
Bureau of Dog Law Enforcement
2301 North Cameron Street
Harrisburg, PA 17110-9408

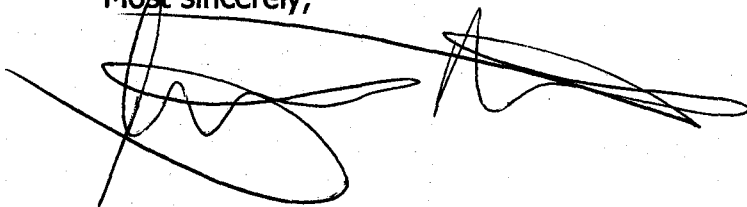
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Most sincerely,

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February 5, 2007

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Harrisburg, PA 17110-9408

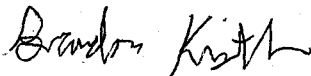
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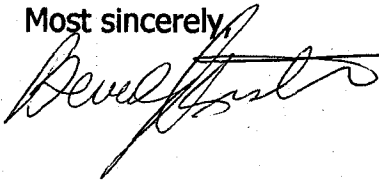
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Most sincerely,

A handwritten signature in black ink, appearing to read "Beverly", is written over a long horizontal line that spans across the page.

February 5, 2007

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Department of Agriculture
Bureau of Dog Law Enforcement
2301 North Cameron Street
Harrisburg, PA 17110-9408

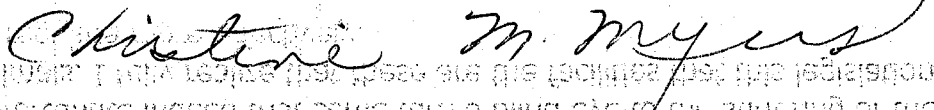
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Most sincerely,


Christine M. Myers

February 5, 2007

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Department of Agriculture
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2301 North Cameron Street
Harrisburg, PA 17110-9408

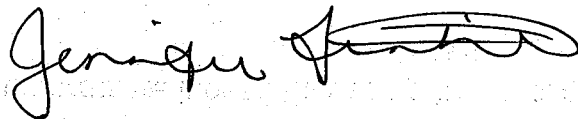
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Most sincerely,



Jennifer Franklin

Mr. & Mrs. James P. Brown
3843 Nottingham Way
Hamilton Square, NJ 08690

February 5, 2007

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James P. Brown
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February 5, 2007

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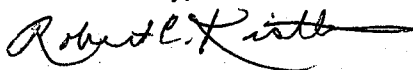
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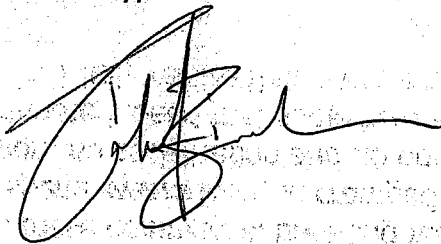
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Most sincerely,

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February 5, 2007

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Department of Agriculture
Bureau of Dog Law Enforcement
2301 North Cameron Street
Harrisburg, PA 17110-9408

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Most sincerely,

Aileen A Boen
3219 W. Coulter Street
Philadelphia, PA 19129

February 5, 2007

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Bureau of Dog Law Enforcement
2301 North Cameron Street
Harrisburg, PA 17110-9408

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Most sincerely,

Randall H. Hunter

February 5, 2007

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Harrisburg, PA 17110-9408

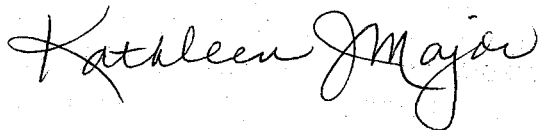
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Most sincerely,

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

Mary Bender
Pa. Dept of Agriculture
2301 North Cameron St
Harrisburg, Pa 17110

Re: Doc # 06-2452 Proposed Changes to the Dog Law

Dear Ms. Bender,

I have recently been made aware of the newly proposed Pa Dog law regulations. Yes, inhumane and substandard care and housing should definitely 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-but this is exactly the setting from which I want to be able to buy a puppy or dog! I want a dog that was raised in a home from breeders who are careful about the health of their dogs, their temperaments and bred dogs that look like the breed they are supposed to be! These breeders would have to either stop raising dogs or build facilities to meet the commercial breeders' standards which are not the way I want a puppy I'd buy raised. The proposed regulations favor the large scale operations that will have the budget to build these "sterile" kennel facilities and hire staff to maintain the outlined record keeping requirements. Why we don't even require 20 minutes of daily mandated physical exercise for our children in schools but for dogs we do!

I want to be able to buy a dog directly from a reputable breeder, not a pet shop or 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 bred with thought to health, temperament, given lots of human contact and exposed to everyday sights and sounds. I want to be able to buy a dog that was allowed to romp in the grass and was played with by children and around other dogs. This proposal goes against the very pack nature of dogs 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 a great disservice though to Pa dog lovers and the buying public to place reputable small scale breeders under the same regulations as these large operations that most of us object to anyway. I oppose these amendments and urge that this proposal be withdrawn. Let's put some common sense thought into the dog law and target the real culprit-large scale multiple breed puppy farms. Why not simply try really enforcing the current dog laws before wasting taxpayer money on regulations that require unenforceable record keeping & exercise standards and will hurt the very type of breeder that should be praised for the manner in which they raise their animals.

Sincerely,

Bernadine Peroutoni

Mary Bender
Pa. Dept of Agriculture
2301 North Cameron St
Harrisburg, Pa 17110

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This effort to improve living conditions for dogs and puppies in large commercial operations/puppy mills is laudable. It is a great disservice though to Pa dog lovers and the buying public to place reputable small scale breeders under the same regulations as these large operations that most of us object to anyway. I oppose these amendments and urge that this proposal be withdrawn. Let's put some common sense thought into the dog law and target the real culprit-large scale multiple breed puppy farms. Why not simply try really enforcing the current dog laws before wasting taxpayer money on regulations that require unenforceable record keeping & exercise standards and will hurt the very type of breeder that should be praised for the manner in which they raise their animals.

Sincerely,



Mary Bender
Pa. Dept of Agriculture
2301 North Cameron St
Harrisburg, Pa 17110

Re: Doc # 06-2452 Proposed Changes to the Dog Law

Dear Ms. Bender,

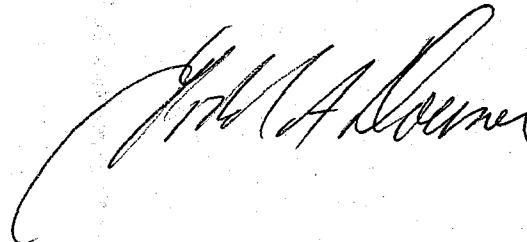
I have recently been made aware of the newly proposed Pa Dog law regulations. Yes, inhumane and substandard care and housing should definitely not be tolerated but not at the expense of responsible breeders.

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-but this is exactly the setting from which I want to be able to buy a puppy or dog! I want a dog that was raised in a home from breeders who are careful about the health of their dogs, their temperaments and bred dogs that look like the breed they are supposed to be! These breeders would have to either stop raising dogs or build facilities to meet the commercial breeders' standards which are not the way I want a puppy I'd buy raised. The proposed regulations favor the large scale operations that will have the budget to build these "sterile" kennel facilities and hire staff to maintain the outlined record keeping requirements. Why we don't even require 20 minutes of daily mandated physical exercise for our children in schools but for dogs we do!

I want to be able to buy a dog directly from a reputable breeder, not a pet shop or 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 bred with thought to health, temperament, given lots of human contact and exposed to everyday sights and sounds. I want to be able to buy a dog that was allowed to romp in the grass and was played with by children and around other dogs. This proposal goes against the very pack nature of dogs 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 a great disservice though to Pa dog lovers and the buying public to place reputable small scale breeders under the same regulations as these large operations that most of us object to anyway. I oppose these amendments and urge that this proposal be withdrawn. Let's put some common sense thought into the dog law and target the real culprit-large scale multiple breed puppy farms. Why not simply try really enforcing the current dog laws before wasting taxpayer money on regulations that require unenforceable record keeping & exercise standards and will hurt the very type of breeder that should be praised for the manner in which they raise their animals.

Sincerely,



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

Re. Doc. No. 06-2452

Dear Ms. Bender,

It has been brought to my attention the newly proposed amendments to the PA dog law regulations. As the owner of (a / several) companion dog (s), I am writing to express my concerns and opposition to the proposed changes.

I purchased my dog directly from a reputable breeder, not a pet shop or large-scale commercial kennel, because I wanted the best chance at getting a healthy dog with a good temperament. I wanted to know that my puppy had been exposed to a variety of normal household situations and was prepared to live the life of a family companion. By buying directly from a breeder, I was able to see the conditions in which my puppy was raised.

The proposed changes, particularly those applying to "Kennels- Primary Enclosures", are of particular concern to me. It is my understanding that in these proposed changes, if a cumulative total of 26 dogs are housed at "the Establishment" during a calendar year, then licensed breeders will be required to have housing facilities that comply with the specifications outlined in the proposed changes. Small scale breeders who fall into the class 1 designation, would no longer be able to maintain, breed, whelp or raise their dogs within their homes. These breeders, who strive to produce dogs which are true to breed type, of good temperament, and, inasmuch as possible, free from genetic disorders, would be forced to either restrict their numbers or build facilities to meet the standards.

I credit my dog's good temperament to thoughtful breeding and to the love and attention that my breeder gave my puppy. Most importantly, this included exposure to everyday sights and sounds, such as:

- 1) My puppy was taken outside to potty on grass regularly. This is of importance to me, as it helped with the housebreaking process.
- 2) In a home situation, my puppy was exposed to different surfaces and noises such as kitchen appliances, television and other noises that occur in my home.
- 3) My puppy was given opportunity to interact with other dogs, helping with social skills needed to meet other dogs we come in contact with.

While I applaud the efforts to improve the living conditions for the dogs and puppies being raised in commercial facilities, I find it a great disservice to the reputable breeder, who standards far surpass in many ways, what these proposed amendments mandate. I, for one, want the choice to buy from a small scale, reputable breeder, and oppose these amendments.

Sincerely,

Holly Baker
PO Box 38
Canadensis PA
18325

Ms. Mary Bender
Pennsylvania Department of Agriculture
2301 North Cameron Street
Harrisburg, PA 17110-0408

RE: Doc. No. 06-2452

Dear Ms. Bender,

It has been brought to my attention the newly proposed amendments to the PA dog law regulations. As a dog owner of several companion dogs, I am writing to express my concerns and opposition to the proposed changes.

I purchased my dog directly from a reputable breeder, not a pet shop or large scale commercial kennel, because I wanted to know that my puppy had been exposed to a variety of normal household situations and was prepared to live a life of a family companion. By buying directly from a breeder, I was able to see the conditions in which my puppy was raised.

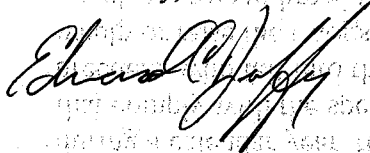
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1. My puppy was taken outside to potty on grass regularly. This is of importance to me, as it helped with the housebreaking process.
2. In a home situation, my puppy was exposed to different surfaces and noises such as kitchen appliances, television and other noises that occur in my home.
3. My puppy was given the opportunity to interact with other dogs, helping with social skills needed to meet other dogs we come in contact with.

While I applaud the efforts to improve the living conditions for the dogs and puppies being raised in commercial facilities, I find it a great disservice to the reputable breeder who standards far surpass in many ways, what these proposed amendments mandate. I for one want the choice to buy from a small scale, reputable breeder, and oppose these amendments.

Sincerely,



Oak Ridge Kennel
532 Knapko Rd
Marion Center, PA 15759

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 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,

Noah Byler

Oak Bend Road Kennel
34 Oak Bend Rd
Newburg, PA 17240

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 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.

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

Yours truly, *Reuben M. Zook*

Mountain Ash Kennel
7211 McCray RD
Fairview, PA 16415

January 26, 2007

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

Dear Ms. Bender,

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

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

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

Yours truly,

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

DAVID PEACHEY
3520 E. BACK MOUNTAIN RD.
BELLVILLE, PA 17004

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 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,

David Peachey
3520 E BK Mtn Rd
Bellville PA 17004

Mountain View Kennel
428 Mountain View Drive
Howard, PA 16841

January 26, 2007

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

Dear Ms. Bender,

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

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

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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,

*Mountain View Kennel
428 Mountain View Dr.
Howard, Pa. 16841*

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

January 22, 2007

Dear Ms. Bender,

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

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

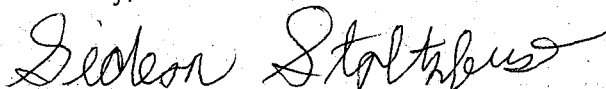
1. Unless the kennel has purchased, sold, or transferred more than 26 dogs in a calendar year to the individual, it is impossible for the kennel to know if the individual is required to have a Pennsylvania kennel license.
2. It is unlawful for the department to regulate and inspect kennels outside of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

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

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

I sincerely request that this proposal be withdrawn.

Yours Sincerely,



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

January 22, 2007

Dear Ms. Bender,

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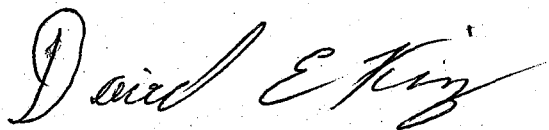
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The current proposal claims to be a general list of ideas to improve the breeding environment for dogs, which are neither substantiated by science nor attributed as accepted canine husbandry practices. A better idea would be for Pennsylvania to adopt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

I sincerely request that this proposal be withdrawn.

Yours Sincerely,

A handwritten signature in cursive script that reads "David E. King". The signature is written in dark ink and is positioned to the right of the typed name "David E. King".

PANTHER VALLEY KENNELS
306 WEST FRONT ST
LANSFORD, PA 18232

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 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,

Wojciech Krajewski

Levi S Nolt
134 Center Square Road
Leola, PA 17540

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 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, *Levi S. Nolt*

2/4/07

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

Dear Ms. Bender:

My name is Janet Warnsdorfer and I reside at 2370 Harmonyville Rd, Elverson, Pa. I am a hobby breeder (only one litter a year) and I train my dogs for show as well as obedience, agility, Rally and water trials. My dogs are my pets, as well as companions in the above venues.

I am writing to comment on the proposed amendments to the Pennsylvania dog law regulations issued on December 16, 2006. I believe that inhumane and substandard kennel conditions should not be tolerated, but I do not agree that most of the proposed regulatory changes are needed, or would necessarily have a beneficial outcome if adopted or affect the people this should be aimed at. Many are impractical, excessively burdensome and costly, unenforceable, and/or will not improve the quality of life for the dogs in these kennels.

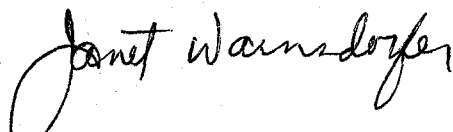
Examples of problems with the proposal are the following:

- * The definition of "temporary housing" would require thousands of small residential hobby and show breeding households to become licensed which could not possibly comply with the regulations, and which there is no reason to regulate.
- * The obligations of owners of "temporary housing" which are made subject to inspection by the proposal are not enumerated or limited.
- * There is no scientific or accepted husbandry basis for the amended space and exercise requirements.
- * Smaller breeders and dog owners who maintain their dogs in their own residential premises but are covered by the Pennsylvania dog law, who provide care and conditions far superior to those required by the proposed new standards, would be unable to comply with the rigid commercial kennel standards.

The above is far from a complete list of the deficiencies with the proposed regulations. I also associate myself with the more detailed comments on this proposal by the Pennsylvania Federation of Dog Clubs.

The Bureau has tacitly conceded that its current regulations have not been adequately enforced. If, after implementing its recently announced enhanced enforcement program, the Bureau finds it is still unable to prevent inhumane treatment of dogs because of specific deficiencies in the existing regulations, it should cite these specific deficiencies and propose changes based on them. The current proposal appears to be merely a laundry list of ideas for improving the environment for dogs that has no connection to specific instances in which the welfare of dogs could not be secured, and no basis in science or accepted canine husbandry practices. I urge that this proposal be withdrawn.

Sincerely yours,



January 31, 2007

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

Dear Ms. Bender:

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

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

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

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

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

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

I strongly urge that this proposal be withdrawn

Sincerely,

James J. Merrick Jr.

January 31, 2007

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

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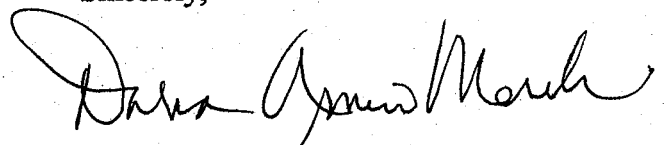
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I strongly urge that this proposal be withdrawn

Sincerely,

A handwritten signature in cursive script, appearing to read "Dana Ann Mark".

Burkett's Country Kennels
RR 7 Box 211A
Punxsutawney, PA 15767

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

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

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

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

The proposed changes would require a substantial increase in manpower with many hours dedicated to filling out written bureaucratic reports and divert the small business owner's time away from caring for their animals.

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

Sincerely,

Stephanie Burkett

Burkholder Farm Kennel
460 Bowers Rd.
Kutztown, PA 19530

January 30, 2007

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

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

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

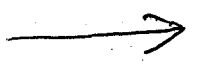
The proposed changes would require a substantial increase in manpower with many hours dedicated to filling out written bureaucratic reports and divert the small business owner's time away from caring for their animals.

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

Sincerely, *The Burkholder Farm Kennel Folk*

Carol Burkholder
Eva Burkholder
Alvin Burkholder
Ivan Burkholder
Martha Burkholder

Ada Burkholder
Ornis Burkholder
Lydia Burkholder
Anna Burkholder
Eva Burkholder



**Lindale Boxers Kennel
16 Queen Rd
Intercourse, PA 17534**

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

January 31, 2007

Dear Ms. Bender,

I am writing 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.

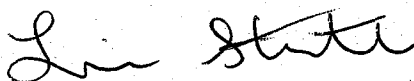
The bureau already requires the name, address, acquisition date, disposition date, type of sale, breed, sex, color, whelping date, and identification number be recorded for each and every dog sold, transferred, adopted, or given away. If the department wishes to enforce the law, they already have all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



**Kings Kennels
329-A Centerville Rd
Gordonville, PA 17529**

January 26, 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.

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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,

David E King

D

**C J Hacketts Kennel
Silver Springs Blvd.
Kresgeville, PA 18333**

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

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

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

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

The proposed changes would require a substantial increase in manpower with many hours dedicated to filling out written bureaucratic reports and divert the small business owner's time away from caring for their animals.

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

Sincerely,

Bonnie Hackett

Locust Hill
125 Tom Cat Hollow Rd
Smithfield, PA 15478

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

January 31, 2007

Dear Ms. Bender,

I am writing 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.

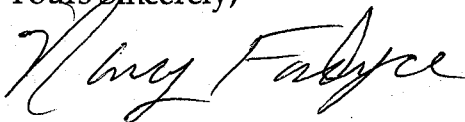
The bureau already requires the name, address, acquisition date, disposition date, type of sale, breed, sex, color, whelping date, and identification number be recorded for each and every dog sold, transferred, adopted, or given away. If the department wishes to enforce the law, they already have all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



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

January 19, 2007

Dear Ms. Bender,

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

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

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

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

Yours truly,

Rudy M. Leahy, Jr.

Michael Martin
680 White Hollow Road
East Earl, PA 17519

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,



*A & W Kennels
600 Conley Road
Mifflinburg, PA 17844*

January 20, 2007

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

Dear Ms. Bender,

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

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

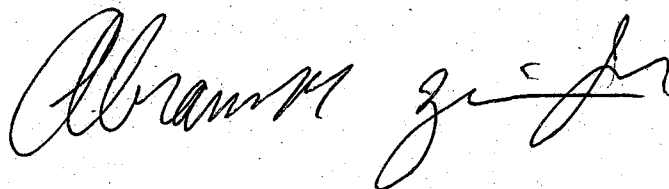
The proposed regulations call for the temperature of the kennel floor to be 50F° in the warm weather. Many kennels are air conditioned to a comfortable 70F°. A dog sleeping on a 50F° floor can develop hypothermia and become ill or die. For temperature, lighting, cleaning, exercise, housing, and veterinary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

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

The proposed changes would require a substantial increase in manpower with many hours dedicated to filling out written bureaucratic reports and divert the small business owner's time away from caring for their animals.

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

Sincerely,



**Little Bit Farm
2413 Trewigtown Rd
Colmar, PA 18915**

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

January 31, 2007

Dear Ms. Bender,

I am writing 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.

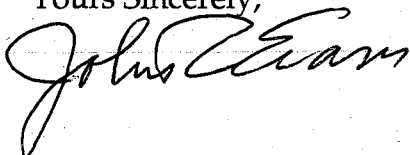
The bureau already requires the name, address, acquisition date, disposition date, type of sale, breed, sex, color, whelping date, and identification number be recorded for each and every dog sold, transferred, adopted, or given away. If the department wishes to enforce the law, they already have all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



**Little Paws Kennel
131 33rd St
Stahlstown, PA 15687**

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

January 31, 2007

Dear Ms. Bender,

I am writing 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.

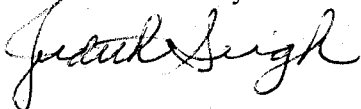
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Additionally, kennels have been custom built to comply with the Department of Agriculture's Dog Law Enforcement standards that were based on USDA standards. The proposed changes of this section will require the demolition of licensed and inspected 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,



Jolanes Kennel
3540 Graham School Rd
Cranberry Township, PA 16066

January 20, 2007

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

Dear Ms. Bender,

I am writing in response to 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.

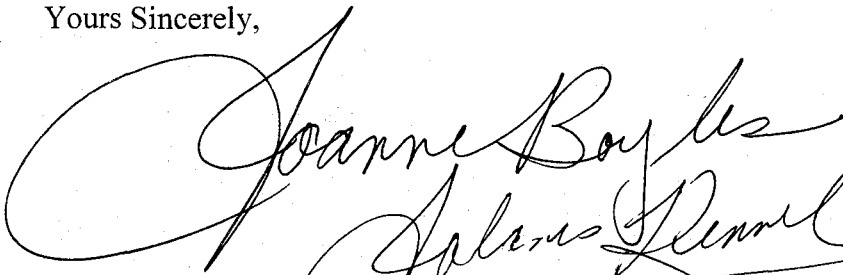
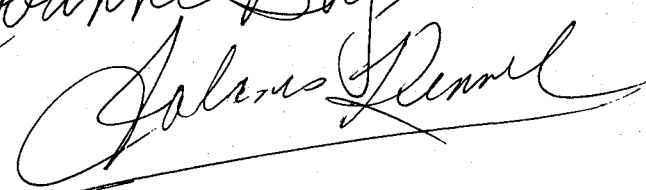
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I sincerely urge that this proposal be rescinded and the USDA standard be adopted in Pennsylvania.

Yours Sincerely,

Lonestar Kennel
2350 Weiss Rd
Quakertown, PA 18951

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

January 31, 2007

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.

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

Yours Sincerely,

Lone Star Kennels
Quakertown Pa

Martin Lucy
1645 Weaverland Rd
East Earl, PA 17519

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

January 31, 2007

Dear Ms. Bender,

I am writing 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.

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

Yours Sincerely,

Lucy W. Martin

January 24, 2007

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

RECEIVED

2007 FEB 20 AM 11: 17

INDEPENDENT REGULATORY
REVIEW COMMISSION

Dear Chairman Coccodrilli,

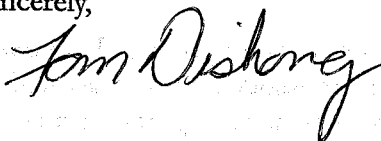
As a Pennsylvania breeder, I am strongly opposed to the overly restrictive rules and regulations that are proposed for kennel owners. The enforcement of regulations such as these will effectively serve to shut down or severely curtail the activities of the concerned, caring and law-abiding breeders in Pennsylvania. The extensive number of regulations outlined in this proposal and the limited time allotted prevents the proper consultation and review of these regulations with our kennel veterinarian and other professionals. Therefore, in order to allow for the proper review and consultation of this extensive proposal, I request a ninety-day extension of the comment period.

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

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

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

Sincerely,



January 24, 2007

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

RECEIVED

2007 FEB 20 AM 11:17

INDEPENDENT REGULATORY
REVIEW COMMISSION

Dear Chairman Coccodrilli,

As a Pennsylvania breeder, I am strongly opposed to the overly restrictive rules and regulations that are proposed for kennel owners. The enforcement of regulations such as these will effectively serve to shut down or severely curtail the activities of the concerned, caring and law-abiding breeders in Pennsylvania. The extensive number of regulations outlined in this proposal and the limited time allotted prevents the proper consultation and review of these regulations with our kennel veterinarian and other professionals. Therefore, in order to allow for the proper review and consultation of this extensive proposal, I request a ninety-day extension of the comment period.

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Sincerely,

John S. Blank

January 24, 2007

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

RECEIVED

2007 FEB 20 AM 11:17

INDEPENDENT REGULATORY
REVIEW COMMISSION

Dear Chairman Coccodrilli,

As a Pennsylvania breeder, I am strongly opposed to the overly restrictive rules and regulations that are proposed for kennel owners. The enforcement of regulations such as these will effectively serve to shut down or severely curtail the activities of the concerned, caring and law-abiding breeders in Pennsylvania. The extensive number of regulations outlined in this proposal and the limited time allotted prevents the proper consultation and review of these regulations with our kennel veterinarian and other professionals. Therefore, in order to allow for the proper review and consultation of this extensive proposal, I request a ninety-day extension of the comment period.

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Sincerely,

John Martin

2559

January 24, 2007

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

RECEIVED

2007 FEB 20 AM 11:17

INDEPENDENT REGULATORY
REVIEW COMMISSION

Dear Chairman Coccodrilli,

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Sincerely,

Mary Martin

2559

RECEIVED

January 24, 2007

2007 FEB 20 AM 11:17

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

INDEPENDENT REGULATORY
REVIEW COMMISSION

Dear Chairman Coccodrilli,

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Sincerely,

Michael C. Miller

January 24, 2007

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

RECEIVED

2007 FEB 20 AM 11:16

INDEPENDENT REGULATORY
REVIEW COMMISSION

Dear Chairman Coccodrilli,

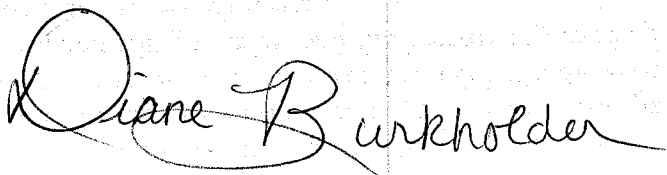
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Sincerely,

Diane Burkholder

January 24, 2007

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

RECEIVED

2007 FEB 20 AM 11:16

INDEPENDENT REGULATORY
REVIEW COMMISSION

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Sincerely,

Whispering Spring Kennel

James Burkner

2559

January 24, 2007

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

RECEIVED

2007 FEB 20 AM 11:18

INDEPENDENT REGULATORY
REVIEW COMMISSION

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Sincerely,

Paul D Zeiser

January 24, 2007

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

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REVIEW COMMISSION

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January 24, 2007

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

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REVIEW COMMISSION

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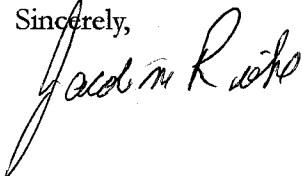
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Independent Regulatory Review Commission
333 Market Street, 14th Floor
Harrisburg, PA 17101

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REVIEW COMMISSION

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Sincerely,

Jacob E. Dlick

January 24, 2007

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

RECEIVED

2007 FEB 20 AM 11:19

INDEPENDENT REGULATORY
REVIEW COMMISSION

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

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Sincerely,

Amos Stoff Jr.
Lydia Mae Stoffus

2559

January 24, 2007

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

RECEIVED

2007 FEB 20 AM 11:18

INDEPENDENT REGULATORY
REVIEW COMMISSION

Dear Ms. Bender,

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Sincerely,

Ralph Sute

2559

Misty Meadow Kennel
155 Misty Meadow Rd
Mount Pleasant, PA 15666

RECEIVED

2007 FEB 20 AM 11:18

January 23, 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 the proposed amendments to the Dog Law Act 225 which was issued on December 16, 2006.

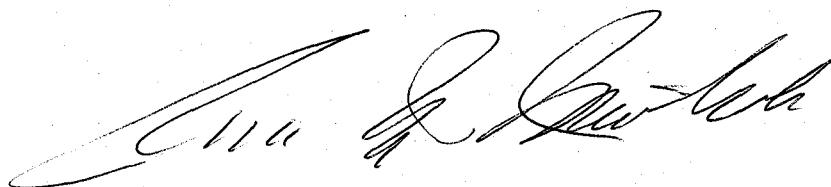
With a full understanding that the bureau is trying to improve substandard kennel conditions, I am not in agreement that most of the changes are necessary.

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.

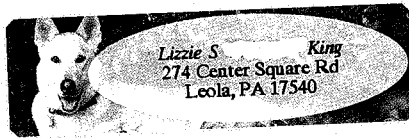
The proposed changes would also require the demolition of Pennsylvania's licensed and inspected kennels. Yet, there is no scientific basis for the change. In addition, the average cost to rebuild kennel will be between \$30,000.00 and \$500,000.00 each.

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

Yours truly,



2559



RECEIVED

2007 FEB 20 AM 11: 17

INDEPENDENT REGULATORY
REVIEW COMMISSION

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

January 23, 2007

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,

Lizzie S. King

Dear Mr. Coccodrilli,

I am writing to ask for your support of the proposed changes for improving the lives of dogs who currently suffer in puppy mills.

With your support, changes to the regulations that affect dogs in puppy mills could include the following requirements:

- doubling the minimum cage size
- requiring daily exercise outside of the cage
- required heat when the temperature drops below 50 degrees
- required cooling (by fan or air conditioning) when the temperature rises above 85 degrees
- improving ventilation in kennel areas
- denying kennel licenses to individuals convicted of animal cruelty within the past 10 years

INDEPENDENT REGULATORY
REVIEW COMMISSION

2007 FEB 12 PM 3:11

RECEIVED

I ask for an exemption for shelters from the kennel expansion and exercise requirements. Also that foster homes should be exempt from kennel housing requirements and instead have separate performance standards appropriate for home care settings.

Thank you for your time,
Mandy Horning



Ms. Mandy Horning
3301B Elton Rd
Johnstown PA 15904

RECEIVED

2559

2007 FEB 12 AM 9:25

INDEPENDENT REGULATORY
REVIEW COMMISSION

STOP Puppy Mills

February 10, 2007

To Those Who Can Make a Difference,
Arthur Coccodrilli, Chairman
Independent Regulatory Review Commission

I am a Pennsylvania resident, and I am writing in support of changing the regulations for puppies in puppy mills. I would like to see the regulations changed to include the following requirements:

- * doubling the minimum cage size
- * requiring daily exercise outside of the cage
- * required heat when the temperature drops below 50 degrees
- * required cooling (by fan or air conditioning) when the temperature rises above 85 degrees
- * improving ventilation in kennel areas
- * denying kennel licenses to individuals convicted of animal cruelty within the past 10 years

This would give these little puppies more space, protection from the elements and time out of their cages.

I would ask for an exemption for the non-profit rescue groups as far as the exercise requirements. These non profit groups do everything they can to find loving homes for these animals.

Sincerely,

Jeannette Siegfried
Jeannette Siegfried
506 E. Callowhill St.
Perkasie, Pa. 18944

January 2007

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

INDEPENDENT REGULAR
REVIEW COMMISSION
2007 FEB 12 PM 2:19

RECEIVED

Dear Ms. Bender:

A friend of mine, in the Lancaster County area, recently brought to my attention the proposed new and amended kennel regulations. At this time I would like to applaud the Governor, and the Bureau of Dog Law for proposing these new regulations to improve the living conditions of the dogs in commercial breeding kennels. I do not reside in Lancaster County, but understand that it is known as the puppy mill capital of the East coast and that needs to change.

I wanted to inform you and your department that I fully support the proposed kennel regulations and will be looking forward to their passing in the upcoming months!

I feel the amended regulations, such as removing the dogs from their cage before being cleaned, adequate lighting, walking each dog at least 20 minutes per day will reflect the care standards that are needed to insure ethical and humane conditions needed for better overall quality of life for our canine companions.

The passage of these kennel regulations will also make Pennsylvania's Department of Agriculture a national leader and diminish Pennsylvania's reputation as "Puppy Mill Capital of the East Coast" something I am sure your department would like to be known for in future generations.

Once again, I support and encourage the passing of proposed kennel regulations!

Sincerely,

Dennis P. Klaim
48 SHULTZ RD.
ORANGEVILLE, PA 17859
570-683-6153

January 2007

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

RECEIVED
2007 FEB 12 PM 2:22
INDEPENDENT REGULATORY
REVIEW COMMISSION

Dear Ms. Bender:

I recently heard from a friend from Lancaster County about the proposed new and amended kennel regulations and first off, I would like to thank the Bureau of Dog Law for proposing these new regulations to improve the living conditions of the dogs in commercial breeding kennels.

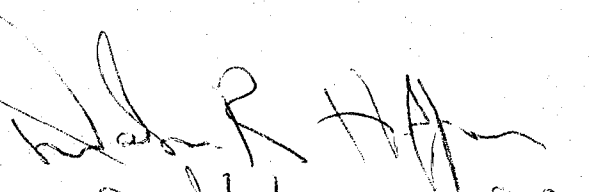
I fully support the proposed kennel regulations and welcome their passage!

It is imperative for these animals to be kept in healthy, sanitary kennels to ensure proper mental and physical health. I believe that doubling the cage is imperative and that walking each dog at least 20 minutes a day will enable these dogs to live a more enriched life, rather than being treated like a crop used to just make money. I also believe that removing the dogs from the kennels for cleaning is humane and it what these animals deserve.

The passage of these kennel regulations will also make Pennsylvania's Department of Agriculture a national leader and diminish Pennsylvania's reputation as "Puppy Mill Capital of the East Coast." As I have become aware, Lancaster County, in particular is the worst when it comes to commercial breeding, and until this changes I, as well as everyone I know, will not be coming to Lancaster County.

Once again, I support and encourage the proposed kennel regulations! I look forward to hearing that these new regulation will be in place before the year's end.

Sincerely,


Bethlehem, PA

2559

**Limestone Kennel
1555 Limestone Rd
Cochranville, PA 19330**

RECEIVED

2007 FEB 20 AM 11: 15

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

INDEPENDENT REGULATORY
REVIEW COMMISSION

January 31, 2007

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,

John S. Blank

2559

John Mark Lapp
10 Brubaker Rd
Lititz, PA 17543

RECEIVED

2007 FEB 20 AM 11:15

January 19, 2007

INDEPENDENT REGULATORY
REVIEW COMMISSION

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

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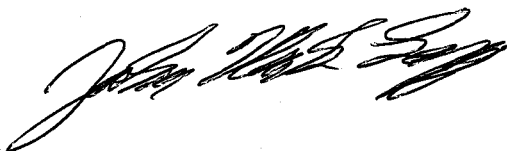
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I sincerely urge that this proposal be rescinded and the USDA standard be adopted in Pennsylvania.

Yours Sincerely,



2559

GIDDEON S. KING
274 CENTER SQUARE ROAD
LEOLA, PA 17540

2007 FEB 20 AM 11:16

INDEPENDENT REGULATORY
REVIEW COMMISSION

IRRC

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

January 23, 2007

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

Dear Mr. Jewett,

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

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

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

Yours Sincerely,

Gideon S. King



BARBARA RUTH KING
274 CENTER SQUARE RD
LEOLA PA 17540-9726

2559

RECEIVED

2007 FEB 20 AM 11:16

INDEPENDENT REGULATORY
REVIEW COMMISSION

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

January 23, 2007

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

Yours Sincerely,

Barbara Ruth King

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.
4. I also commend the Department of Agriculture and Bureau of Dog Law Enforcement for including a provision that requires the dog wardens to visually observe the physical condition

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

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

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

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

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

8. Stacking primary enclosures on top of one another should be prohibited. Stacking cages creates an unnatural environment for the dogs. Additionally, it makes observation of the dogs

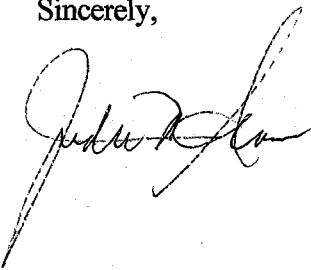
more difficult and creates sanitation problems. Even with a tray or partition between cages, it is likely that the partitions may overflow, causing feces, urine, food, water, and hair to fall onto the dogs located in the cages below.

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

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

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

Sincerely,

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

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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Sincerely,

Linda J. Wickman

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,

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Sincerely,

Russella Malinowski

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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Nancy D. Miller, RN
2304 Birch Drive
Gwynn Oak, MD 21207

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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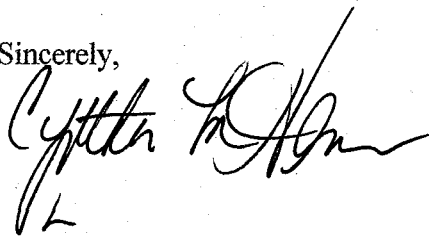
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Cynthia K. Adams

Bureau of Dog Law Enforcement
Pennsylvania Department of Agriculture
Attn: Ms. Mary Bender
2301 North Cameron Street
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February 13, 2007

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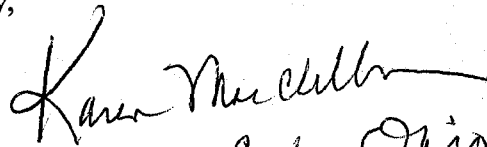
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Karen McCullin
Copley, Ohio

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,

Erna A. Turbelych
803 Glass Ave.
Essex Md.

21221

410-574-0499

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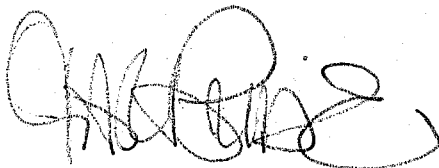
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Bureau of Dog Law Enforcement
Pennsylvania Department of Agriculture
Attn: Ms. Mary Bender
2301 North Cameron Street
Harrisburg, PA 17110-9408

February 13, 2007

RE: Comments on proposed Dog Law regulations

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Paul S. Dault
850 Lakeview Drive
Mountain Top Pa
18707

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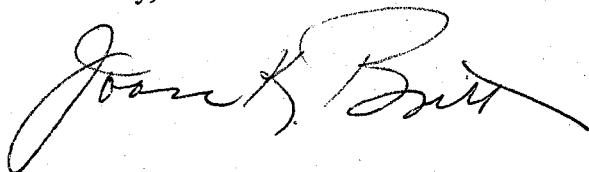
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Bureau of Dog Law Enforcement
Pennsylvania Department of Agriculture
Attn: Ms. Mary Bender
2301 North Cameron Street
Harrisburg, PA 17110-9408

February 2, 2007

RE: Comments on proposed Dog Law regulations

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LEROY C. CUMENS
NEW HOLLAND, PA. 17557

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Pennsylvania Department of Agriculture
Attn: Ms. Mary Bender
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850 Lakeview Drive
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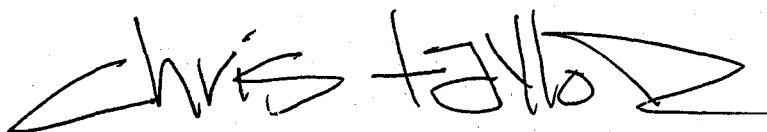
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A handwritten signature in black ink, appearing to read "Chris Tally". The signature is stylized and written in a cursive-like font.

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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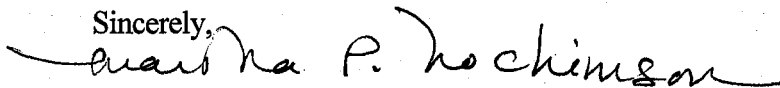
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