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February 4, 2007

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

RECEIVED
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INDEPENDENT REGULATORY
REVIEW COMMISSION

Dear Ms. Bender:

I write as a long time dog lover and owner; involved only for the pleasure dogs bring me and my family. I am deeply concerned with the regulations issued on December 16, 2006, pertaining to the regulation of dogs in Pennsylvania. Your proposals will rid the state of precisely the good breeders, those who set the standard for animal husbandry, in order to regulate those puppy mills that are already covered by the current, largely unenforced, regulations.

The definitions in the regulation will require small residential hobby and show breeding households to become licensed. These breeders cannot possibly comply with the rigid commercial kennel standards proposed for facilities and procedures. The record keeping requirements with respect to exercise, cleaning, and other aspects of kennel management are excessively burdensome and serve no useful purpose, as it would be impossible to verify their accuracy in all but the most egregious circumstances. Such egregious circumstances already violate existing regulations.

Perhaps the most egregious effect of the proposed changes are those relating to kennel size, especially as it affects the many rescue organizations in the state. The regulations as proposed require that a kennel facility should be large enough to house all the dogs that you *might* have during a year. It reads that "the establishment shall have kennel facilities for all of the dogs currently on the premises or TO BE kept, harbored, boarded, sheltered, sold, given away or in any way transferred by the establishment, which ever number is larger."

As written, a rescue group which rehomes 100 dogs during the year would need a kennel large enough to house 100 dogs, even though most of them might go to the "temporary homes" that would now be regulated by the law. Is it really good policy to make rescue more difficult?

The other part of this regulation that seems especially inappropriate is the requirement that dogs be raised in laboratory like settings. Regulations that have the effect of preventing breeders from keeping animals in their homes, exposing and exercising and allowing their puppies to play on grass, and allowing for thorough socialization to dogs and people serve no purpose and are contrary to good socialization and training practices. I want my next puppy to be exposed to lots of people and dogs by knowledgeable breeders who can

make good judgments for my puppy's future mental and physical health. There is no scientific or accepted husbandry basis for the amended space and exercise requirements you have set forth.

I urge that you withdraw and rethink these regulations, in consultation with reputable breeders and dog trainers. I suggest you consult with the Pennsylvania Federation of Dog Clubs, and the American Kennel Club. Both organizations have been dealing with high volume breeders (puppy mills) for many years.

All of our dogs – we have lived in Pennsylvania for over 50 years now- have come from small breeders. They do an excellent job caring for and raising wonderful puppies that bring many years of pleasure to families like mine. Please do not abuse the power government has to effectively regulate the "good guys" out of existence.

Thank you very much for your consideration of my views.

Sincerely,



Vivian M. Ross

C: Rep. Samuelson
Sen. ~~Dent~~ *Boscota*

*VIVIAN ROSS 545 PINE TOP TRAIL
BETHLEHEM 18017*