

2559

Feb. 1, 07

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

RECEIVED

2007 FEB -5 AM 11:46

INDEPENDENT REGULATORY
REVIEW COMMISSION

January 31, 2007

Dear Chairman Coccodrilli,

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

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

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

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

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 I request that this proposal be withdrawn.

Yours sincerely,

Reuben Swarrey

Reuben Swarrey
HCR 61 Box 541
Mill Creek, PA 17060

2559

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Independent Regulatory Review Commission

Attn: Arthur Coccodrilli, Chairman

333 Market Street, 14th Floor

Harrisburg, PA 17101

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INDEPENDENT REGULATORY
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January 30, 2007

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Yours sincerely,



Sunny Side Kennel
735 Cold Run Road
Millmont, PA 17845

2559

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

January 30, 2007

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

Dear Chairman Coccodrilli,

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

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

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

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

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

Yours truly,

Reuben M. Zook

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Yours sincerely,

Warren Z Sensenig

Valley View Kennel
355 Hammertown Rd
Narvon, PA 17555

Jonas Beiler
196 Blank Road
Narvon, PA 17555

2559

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2007 FEB -5 AM 11:46

January 18, 2007

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

INDEPENDENT REGULATORY
REVIEW COMMISSION

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Yours truly,

Jonas S. Beiler

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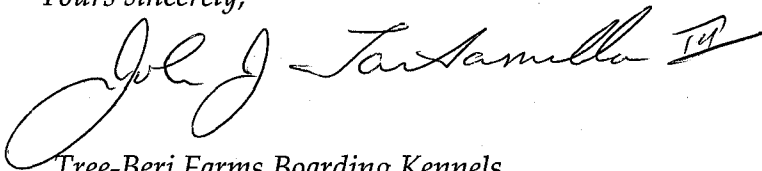
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Yours sincerely,



Tree-Beri Farms Boarding Kennels
637 Grahams Wood Rd
Newville, PA 17241

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

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Yours sincerely,

Mary F. Morgan - Ph. 717-225-1928

Tamora Kennels
784 Menges Mill Rd
Spring Grove, PA 17362

OVER

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

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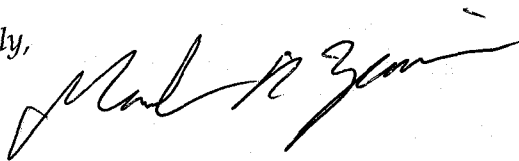
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Yours sincerely,



Turkey Hill Kennel
300 E. Black Creek Rd
East Earl, PA 17519

2559

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

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INDEPENDENT REGULATORY
REVIEW COMMISSION

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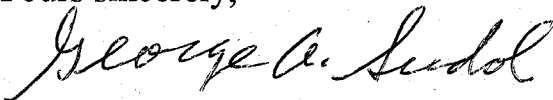
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The Departments direction and intentions are neither attributed as accepted canine husbandry practices nor substantiated by science. The Department should base their changes on education to improve the industry. I request that this proposal be withdrawn.

Yours sincerely,



Sudol's Boarding & Grooming Kennel
RR 2 Box 73
Watsonstown, PA 17777

2559

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

RECEIVED

2007 FEB -5 AM 11:44

INDEPENDENT REGULATORY
REVIEW COMMISSION

January 31, 2007

Dear Chairman Coccodrilli,

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

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

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

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

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

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

Yours sincerely,



Jacob M. Zimmerman
771 Zimmerman Road
Mifflinburg, PA 17844

Mountain Side Kennel
19526 Sweetwater Rd
Dry Run, PA 17220

2559

January 26, 2007

RECEIVED

2007 FEB -5 AM 11:44

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

INDEPENDENT REGULATORY
REVIEW COMMISSION

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

Dear Mr. Jewett,

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

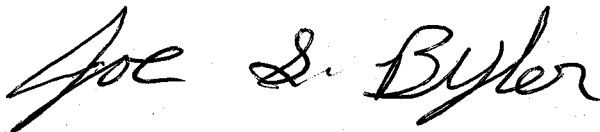
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The proposed record keeping would require me to write down the date and time I washed each food and water bowl, every time a pen is cleaned; each individual outside run is cleaned, etc. It would be better for me to have my general daily procedures 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,



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

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INDEPENDENT REGULATORY
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Yours sincerely,



Bonnie Sullivan
2375 Manncreek Rd
Mansfield, PA 16933

2559

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

RECEIVED

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INDEPENDENT REGULATORY
REVIEW COMMISSION

January 30, 2007

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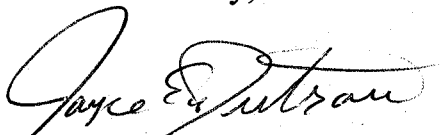
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Yours sincerely,



Summer Mountain Kennel
329 Summer Mt. Rd
Loganton, PA 17747

2559

January 26, 2007

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



Ms Susan Weber
342 Deer Run Dr.
Roaring Spg, PA 16673

Dear Chairman Coccodrilli,

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Yours truly,

Susan Weber

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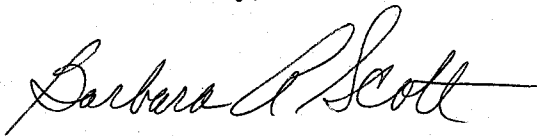
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Yours sincerely,



Stratford Yorkshire Terriers
8 Teal Rd
Mechanicsburg, PA 17050

2559

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

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2007 FEB -5 AM 11: 52

INDEPENDENT REGULATORY
REVIEW COMMISSION

January 24, 2007

Dear Chairman Coccodrilli,

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Yours sincerely,

Timothy Stahl
3559 Silver Creek
Port Trevorton, PA 17864

RECEIVED

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

2007 FEB -5 AM 11: 51

INDEPENDENT REGULATORY
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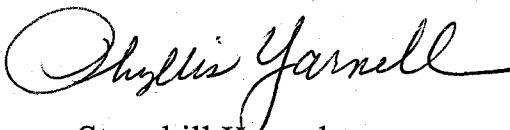
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Yours sincerely,



Stonehill Kennel
1581 State Route 239
Stillwater, PA 17878

2559

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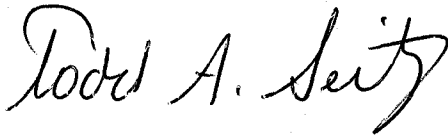
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Yours sincerely,



Twin Maples Kennel
665 N. Biesecker Rd
Thomasville, PA 17364

2559

John F. Glick
85 Archery Road
New Providence, PA 17560

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January 18, 2007

2007 FEB -5 AM 11:51

Independent Regulatory Review Commission
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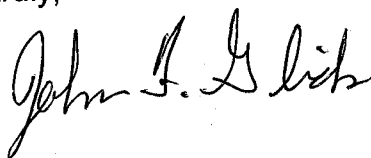
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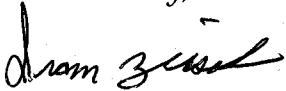
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Yours sincerely,



Timber Ridge Kennels
513 Ridge Ave
Ephrata, PA 17522

North Node Siberians
8659 Reservoir Rd
Germansville, PA 18053

January 30, 2007

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333 Market Street, 14th Floor
Harrisburg, PA 17101

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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,

Jeanette S. Salsi

RECEIVED

2007 FEB -5 AM 11:50

INDEPENDENT REGULATORY
REVIEW COMMISSION

2559

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

RECEIVED

2007 FEB -5 AM 11:50

INDEPENDENT REGULATORY
REVIEW COMMISSION

January 31, 2007

Dear Chairman Coccodrilli,

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

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

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

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

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

Yours sincerely,



The Petite Puppy Botique
51 A&B Chambersburg St
Gettysburg, PA 17325

2559

North Slope Kennels
303 Mill Rd
Ephrata, PA 17522

RECEIVED

2007 FEB -5 AM 11: 50

INDEPENDENT REGULATORY
REVIEW COMMISSION

January 30, 2007

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

Dear Chairman Coccodrilli,

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

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

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

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

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

Yours truly,



2559

North Slope Kennels
303 Mill Rd
Ephrata, PA 17522

January 30, 2007

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

Dear Chairman Coccodrilli,

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

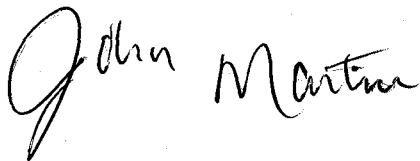
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I sincerely urge that this proposal be withdrawn, as the beneficial outcome will be in question if the proposal is adopted.

Yours truly,

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

North Slope Kennels
303 Mill Rd
Ephrata, PA 17522

RECEIVED

2007 FEB -5 AM 11:49

INDEPENDENT REGULATORY
REVIEW COMMISSION

January 30, 2007

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

Dear Chairman Coccodrilli,

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

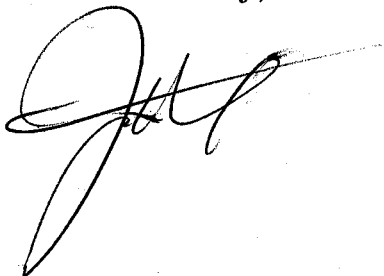
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I sincerely urge that this proposal be withdrawn, as the beneficial outcome will be in question if the proposal is adopted.

Yours truly,



2559

Oak Grove Kennels
Rd 2 Box 19D Hoover Dr.
Martinsburg, PA 16662

January 30, 2007

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

Dear Chairman Coccodrilli,

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

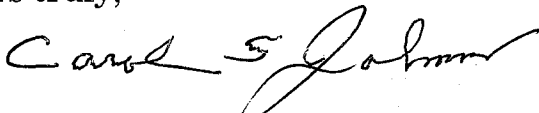
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The proposed changes would also require the demolition of Pennsylvania's licensed and inspected kennels. Yet, there is no scientific basis for the change. In addition, the average cost to rebuild kennel will be between \$30,000.00 and \$500,000.00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

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

Yours truly,


Carol S. Johnson
OWNER

RECEIVED

2007 FEB -5 AM 11:49

INDEPENDENT REGULATORY
REVIEW COMMISSION

2559

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

RECEIVED

2007 FEB -5 AM 11:49

INDEPENDENT REGULATORY
REVIEW COMMISSION

January 30, 2007

Dear Chairman Coccodrilli,

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

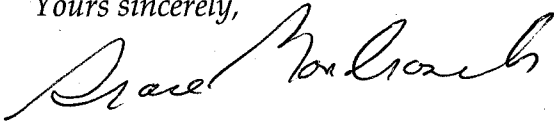
I appreciate that fact that the bureau has helped to improve the dog laws in the past several years. However, the current proposed regulation changes have appeared to be intentionally burdensome and go far beyond mere rulemaking.

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

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

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

Yours sincerely,



Trifecta Kennels
Gilbert Rd
Gilbert, PA 18331

2559

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

RECEIVED

2007 FEB -5 AM 11:48

INDEPENDENT REGULATORY
REVIEW COMMISSION

January 24, 2007

Dear Chairman Coccodrilli,

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

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

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

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

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

Yours sincerely,

Nancy Fordyce
Locust Hill Kennel
125 Tom Cat Hollow Rd
Smithfield, PA 15478

2559

North Star Beagles
3429 Whistler Rd
Stoystown, PA 15563

RECEIVED

2007 FEB -5 AM 11:47

INDEPENDENT REGULATORY
REVIEW COMMISSION

January 30, 2007

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

Dear Chairman Coccodrilli,

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

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

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

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

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

Yours truly,

Wallace Berkebile

2559

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

RECEIVED

2007 FEB -5 AM 11:47

INDEPENDENT REGULATORY
REVIEW COMMISSION

January 30, 2007

Dear Chairman Coccodrilli,

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

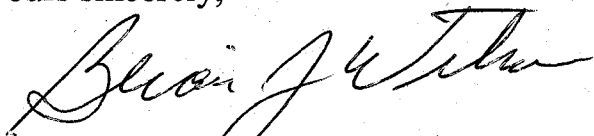
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The Departments direction and intentions are neither attributed as accepted canine husbandry practices nor substantiated by science. The Department should base their changes on education to improve the industry. I request that this proposal be withdrawn.

Yours sincerely,



Stoneledge Boarding Kennel
271 River Rd
Auburn, PA 17922

PAW PRINTS KENNEL
2911 WILLOW STREET PIKE
WILLOW STREET, PA 17584

2559

RECEIVED

JANUARY 30, 2007

2007 FEB -5 AM 11:47

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,

Sharon Hill, Owner

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

January 26, 2007

Dear Chairman Coccodrilli,

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

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


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

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

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

I sincerely request that this proposal be withdrawn.

Yours Sincerely,


Denny's Kennel
714 Carbon Center Rd
Fenelton, PA 16034

RECEIVED

2007 FEB -5 AM 11:49

INDEPENDENT REGULATORY
REVIEW COMMISSION

2559

RECEIVED

2007 FEB -5 AM 11:47

INDEPENDENT REGULATORY
REVIEW COMMISSION

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

January 30, 2007

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I sincerely request that this proposal be withdrawn.

Yours Sincerely,

Susan J. Horning
Ada Horning

Farm-Pal Kennels
78 Centennial Rd
Mifflinburg, PA 17844

2559

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

RECEIVED

2007 FEB -5 AM 11:47

INDEPENDENT REGULATORY
REVIEW COMMISSION

January 30, 2007

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I sincerely request that this proposal be withdrawn.

Yours Sincerely,

Jonathan Z. Fisher

Jonathan Fisher
542 Mount Vernon Rodd
Gap, PA 17527

P.S. If act. 225 is approved it will ~~not~~ cause the price of dogs to rocket due

to the call for a lot of uncalled for man power which will still not improve the canines health & welfare. High prices will also rocket the amount of backyard breeding to be done by people who have little to no experience. I am concerned for health & welfare of the canine's future

2559

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

RECEIVED

2007 FEB -5 AM 11:46

January 31, 2007

INDEPENDENT REGULATORY
REVIEW COMMISSION

Dear Chairman Coccodrilli,

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I sincerely request that this proposal be withdrawn.

Yours Sincerely,

A.R. Jisher

Double A Kennels
6756 McClays Mill Rd
Newburg, PA 17240

2559

RECEIVED

2007 FEB -5 AM 11:46

INDEPENDENT REGULATORY
REVIEW COMMISSION

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

January 30, 2007

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I sincerely request that this proposal be withdrawn.

Yours Sincerely,

A. R. Fisher

Anna Fisher
6756 McClays Mill Rd.
Newburg, PA 17240

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

RECEIVED

2007 FEB -5 AM 11:43

INDEPENDENT REGULATORY
REVIEW COMMISSION

January 26, 2007

2559

Dear Chairman Coccodrilli,

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

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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,



Deer Hollow Kennel
185 Truce Rd
New Providence, PA 17560

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

RECEIVED

2007 FEB -5 AM 11:43

INDEPENDENT REGULATORY
REVIEW COMMISSION

January 22, 2007

Dear Chairman Coccodrilli,

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

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

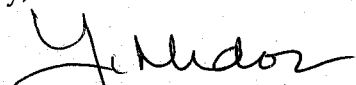
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The current proposal claims to be a general list of ideas to improve the breeding environment for dogs, which are neither substantiated by science nor attributed as accepted canine husbandry practices. A better idea would be for Pennsylvania to adopt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

I sincerely request that this proposal be withdrawn.

Yours Sincerely,


Country Side Kennels
60 Reese Point Lane
Washington, PA 15301

2559

283 Williams Rd
Windsor NY 13865
607-655-2170
January 31, 2007

RECEIVED

2007 FEB -5 AM 11:43

INDEPENDENT REGULATORY
REVIEW COMMISSION

COPY OF LETTER
REGARDING
REGULATORY ID # 2-152 (#2559)

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

Dear Ms. Bender:

I am a concerned dog owner commenting on the proposed amendments to the Pennsylvania dog law regulations issued on December 16, 2006. Although I live in New York State, I board my dogs in Pennsylvania when I go out of town and I attend a number of dog-related events in Pennsylvania each year - including agility and herding trials and dog club activities. I belong to the American Tending Breeds Association which is a Pennsylvania club. I take herding lessons and herding clinics in Pennsylvania.

I am deeply upset about inhumane and substandard kennel conditions when they are found to exist, but I believe that any problems can be addressed by enforcing current regulations. These proposed regulation changes will be very costly to small businesses and local governments with lack of adequate evidence or justification. In addition, the regulations appear to be written in ways that will have unintended consequences.

The regulatory impact statement indicates that it will cost most kennel owners, who already comply with existing regulations, an additional \$5,000 to \$20,000 to comply. These are small businesses and I do not think they have this kind of money. A family-owned boarding kennel probably nets about \$30,000 a year - how are they going to be able to comply with these regulations and what is your basis for demanding these changes? I am very concerned that the kennel where I board my dogs will go out of business.

The definition of "temporary housing" could also cause many unintended consequences. I go to herding clinics, for example, at farms in Pennsylvania. If more than 26 dogs in a year visit these farms for the purpose of taking herding lessons, will these farms then be considered kennels and have to get kennel licenses? Given the costs and strange requirements of this proposed law, I think they will simply have to stop offering training opportunities instead. If you have a livestock industry in Pennsylvania, you need trained herding dogs and this could be affected by these proposed regulations.

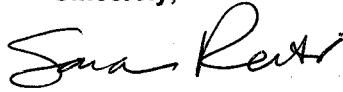
Furthermore, I notice a big difference in the roads and upkeep when I cross the border into Pennsylvania. The rural townships in my area are really struggling to provide basic services and infrastructure given their tax bases. Where are they going to get an additional \$5,000 to \$10,000 a year to enforce these regulations?

Dog owners, particularly those involved in dog shows and other dog sports, are organizing to boycott shows in states or cities that pass unreasonable dog legislation. I have heard that outrage from the dog fancy may cost the Louisville Kentucky area as much as \$6 million dollars as many participants are planning to boycott the large Louisville shows this spring or to stay and eat outside of Louisville if they do attend. Look at the economic impact of dog show and performance events in Pennsylvania and consider the potential effects of unneeded regulations on attendance. No one is,

for example, going to pay to get a veterinary health certificate every time they bring their dog to an event in Pennsylvania - they will simply stop coming.

The proposed regulations seem to be a bad idea. Put more money and effort into enforcing existing regulations. I think you need to more carefully consider the economic consequences of these regulations and withdraw the proposals.

Sincerely,

A handwritten signature in black ink that reads "Sara Reiter". The signature is written in a cursive style with a large, looped "S" and a distinct "R".

Sara Reiter

Cc: Arthur Coccodrilli, Chairman, Independent Regulatory Review Commission

January 29, 2007

Independent Regulatory Review Commission
 Attn: Arthur Coccodrilli, Chairman
 333 Market Street, 4th Floor
 Harrisburg, PA 17101

RECEIVED

2007 FEB -5 AM 11:49

INDEPENDENT REGULATORY
 REVIEW COMMISSION

Re: Proposed Dog Law Act 225

Dear Chairman Coccodrilli,

My Name is Shirley Patterson. I live in Chester County, 2102 Chestnut Court, Pottstown, PA. I have been involved with dogs for a good 30 years. I have bred and shown Yorkshire Terriers for 25 years. I am a member of many local Kennel, Obedience and Agility Clubs as well as National Breed Clubs. I have trained my dogs to be welcomed as family pets, as Therapy Dogs and as a part of my own forever family. They are my life and my hobby. I have abided by the past and present Dog Laws set forth in PA. I am an educated breeder. Attending all types of educational seminars to enhance the health and welfare of my animals.

1) I am writing to comment on the proposed amendments to the Pennsylvania dog law Act 225 issued on December 16, 2006. I believe that "Mans Best Friend" should not live their lives in kennels that have substandard conditions that are in-humane and detrimental to the physical and emotional health of the animal, however the regulatory changes that are being proposed create unnecessary and unenforceable situations for most hobby/show Kennels. These changes will not improve the quality of life for dog in a Class 1 Kennel because those dogs are already living in conditions far superior to those required by the proposed new standard. The benefits that these dogs have now would be taken away rather than being improved. Why would one want to do that? Makes no common sense.

2. Temporary Housing:

Why regulate temporary housing? There is no mass production of puppies in that situation that will need to be housed in laboratory type conditions. Temporary housing needs to be reevaluated by individuals who are familiar with the practices involving a hobby/show breeding type home kennel as well as temporary homes for rescued dogs. What obligations would be imposed upon them ????

3. Animal Husbandry:

a) Space: There are some breeds of dogs that want a cave type space rather than a wide-open space. There are breeds that need a queen size bed space and there are breeds that need a small round circular pillow space. Space is usually breed specific. Extreme standardization involving space required for the cumulative number of dogs in a kennel situation where the count only ever reaches half the number of dogs your kennel license allows but you are by law expected to comply with space for the total number is unrealistic and needs more discussion.
 Toy breeds are companion animals to the extreme their space is near you so being housed out in A separate building is not the answer for a hobby /show kennel where people search for a Homebred family pet rather than a laboratory conditioned pet.

b) Exercise requirements: Not all breeds need to be walked for 20 minutes. It is a fact that Toy Breeds get enough exercise just running around on the floor. Not all Breeds want to go outside for long periods of time How many humans walk for 20 minutes? Sure we walk from the TV to the Refrigerator several times. We do sit in our chairs a lot—at home and at work and while in our car.
 Hey, these Canines will be in better condition than any of us Humans!

4. Specified Standards: The amount required to renovate a facility to the "Laboratory type" Standards to comply with the proposed regulations I feel is definitely not an accurate figure. It will cost far more to comply with the proposed cumulative amount per kennel class because you will definitely have to enlarge your kennel.

Smaller hobby/show breeders and dog owners who maintain their dogs in their own residential premise and are now covered by the Pennsylvania dog law should be allowed to be grandfathered in. During the past years they have provided care and conditions far superior to those required by the proposed new standards. They have complied with all aspects of the past and present Dog Laws and should not be put into the same classification as a large commercial kennel whose main purpose is the income from puppy sales with no regard to health, welfare, training and socialization before the sale. Why Penalize the Hobby/Show breeders when they have already complied and have done a good job?

5. Record keeping Requirements: What on earth does this improve. One could do it at night before one goes to bed and just hang it up the next morning. No possible way to really verify. There are more important jobs to spend your time doing besides filling out a sheet of inaccuracies. An animal could mess up 2 minutes after you just initialed the sheet signifying that the cleaning was done. So does that prove that you are not complying with your clean kennel regulation?

6. Housing and social interaction of dogs: The Proposals in regard to the housing and interaction of dogs of different sizes are contrary to good husbandry, socialization and training practices. We take dogs to puppy training classes to socialize them with other breeds. Do we separate small and large people? Do they all get along? NO. Why? Because of our various temperaments and our socialization skills. I would tend to think that an educated person in dogs knows which dogs or breeds of dogs will get along with one another in a kennel situation without it being law enforced.

Throughout this entire law I do not see one mention of education, instead we are making regulations that we will not have the manpower to enforce and telling everyone that it is not going to cost us any more. Who is going to pay for this? Why is something not done to educate those kennel owners, kennel helpers, kennel keepers who want to make their living by breeding animals. Were not going to stop them but education could help. Probably some of the kennel helpers and keepers living facilities are dirtier than the kennels. Anyone can get a job at a kennel and I mean anyone. At present, one does not need a Highschool diploma. When we wonder why the animals are not cared for in a humane manner it might relate to uneducated individuals being hired to do the job that they have not been trained to do. There is no education. My children had to be taught how to clean. You must have further education to obtain a license for many other trades. Why not demand a positive action rather than all these impending regulations. Suggest and Offer mandatory Kennel Management, Kennel Aid, Essentials of Animal Care 101 and Animal First Aid courses etc.

Education always makes a difference!

I am also in agreement with 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,


Shirley A. Patterson

2559

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

January 27, 2007

Dear Chairman Coccodrilli,

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

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


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

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

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

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

Yours sincerely,


Windi-Pines Kennel
360 Wolfe Run Rd.
Freedom, PA 15042

INDEPENDENT REGULATORY
REVIEW COMMISSION

2007 FEB -5 AM 11: 44

RECEIVED

2559

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

RECEIVED

2007 FEB -5 AM 11:44

INDEPENDENT REGULATORY
REVIEW COMMISSION

January 19, 2007

Dear Chairman Coccodrilli,


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

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

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

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

Yours truly,



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

Levi Brubaker
RD 2 Box 122
2559 Martinsburg, PA 16662

RECEIVED

2007 FEB -5 AM 11:43

INDEPENDENT REGULATORY
REVIEW COMMISSION

January 31, 2007

IRRC

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

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

Dear Mr. Jewett,

I am writing in 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.

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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,


2559

RECEIVED

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

2007 FEB -5 AM 11:43

INDEPENDENT REGULATORY
REVIEW COMMISSION

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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,

Katie C. Peachey

3520 East Back mtn Rd.

Bellefonte, PA

17004

2559

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

RECEIVED

2007 FEB -5 AM 11:43

INDEPENDENT REGULATORY
REVIEW COMMISSION

January 30, 2007

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

Dear Chairman Coccodrilli,

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

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

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

Unless the kennel has purchased, sold, or transferred more than 26 dogs in a calendar year to the individual, it is impossible for the kennel to know if the individual is required to have a Pennsylvania kennel license.

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

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

Yours Sincerely,

Lester S. Martin

2559

Buckwalter Kennels Inc.
106 Lancaster Ave
Malvern, PA 19355

RECEIVED

2007 FEB -5 AM 11:43

INDEPENDENT REGULATORY
REVIEW COMMISSION

January 30, 2007

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

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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,

Ronald J. Buckwalter - Jr

2559

Lo-Rons Schnauzers Kennel
6323 Grindstone Hill Rd
Chambersburg, PA 17201

RECEIVED

2007 FEB -5 AM 11:47

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,

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

Yours Sincerely,

Ronald M. Mellott

2559

Elsie Carbaugh
2730 Jack Road
Chambersburg, PA 17201

RECEIVED

2007 FEB -5 AM 11:46

January 30, 2007

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

INDEPENDENT REGULATORY
REVIEW COMMISSION

Dear Chairman Coccodrilli,

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

Sincerely,

Elsie Carbaugh

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

RECEIVED

2007 FEB -5 AM 11:46

2559

INDEPENDENT REGULATORY
REVIEW COMMISSION

January 31, 2007

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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,

Wayne Sensenig
987 Valley View Road
New Holland, PA 17557

2559

Lighthouse Kennel
225 Upper Valley Rd
Christiana, PA 17509

RECEIVED

2007 FEB -5 AM 11:46

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

INDEPENDENT REGULATORY
REVIEW COMMISSION

January 31, 2007

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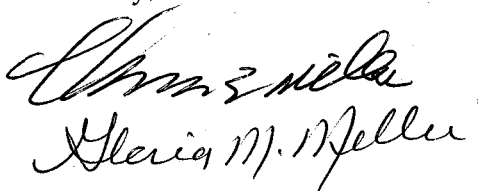
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I sincerely urge that this proposal be rescinded and the USDA standard be adopted in Pennsylvania.

Yours Sincerely,


Gloria M. Miller

2559

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

RECEIVED

2007 FEB -5 AM 11:46

INDEPENDENT REGULATORY
REVIEW COMMISSION

January 31, 2007

Dear Chairman Coccodrilli,

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

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

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

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

I sincerely urge that this proposal be rescinded.

Yours Sincerely,

Mervin M Hoover

Mervin M. Hoover
380 Limestone Road
Milton, PA 17847

2559

RECEIVED

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

2007 FEB -5 AM 11:46

INDEPENDENT REGULATORY
REVIEW COMMISSION

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I sincerely urge that this proposal be rescinded.

Yours Sincerely,

Mervia Hoover

Mervia Hoover
308 Limestone Rd
Milton, PA 17847

2559

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

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2007 FEB -5 AM 11:46
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I sincerely urge that this proposal be rescinded.

Yours Sincerely,

Laura L. Horst

Laura L Horst
4230 Chapman Hollow Rd
Mount Pleasant Mills, PA 17853

Independent Regulatory Review Commission

Attn: Arthur Coccodrilli, Chairman

333 Market Street, 14th Floor

Harrisburg, PA 17101

RECEIVED

2007 FEB -5 AM 11:45

INDEPENDENT REGULATORY
REVIEW COMMISSION

January 31, 2007

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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,

Elvin H Zimmerman

Zimmerman's Kennel
2854 Col John Kelly Rd
Lewisburg, PA 17837

2559

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

RECEIVED

2007 FEB -5 AM 11:45

INDEPENDENT REGULATORY
REVIEW COMMISSION

January 31, 2007

Dear Chairman Coccodrilli,

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

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

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

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

I sincerely urge that this proposal be rescinded.

Yours Sincerely,



Horse N' Hound Haven Kennel
1385 Hunterstown Hampton Rd
New Oxford, PA 17350

2559

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

RECEIVED

2007 FEB -5 AM 11:45

INDEPENDENT REGULATORY
REVIEW COMMISSION

January 31, 2007

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I sincerely urge that this proposal be rescinded.

Yours Sincerely,



Mary H Horst
1273 E Earl Rd
East Earl, PA 17519

2559

John R. Zimmerman
1087 Silver Hill Rd
Narvan, PA 17555

RECEIVED

2007 FEB -5 AM 11:45

INDEPENDENT REGULATORY
REVIEW COMMISSION

January 19, 2007

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

Dear Chairman Coccodrilli,

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

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

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

Unless the kennel has purchased, sold, or transferred more than 26 dogs in a calendar year to the individual, it is impossible for the kennel to know if the individual is required to have a Pennsylvania kennel license.

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

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

Yours Sincerely,

John R. Zimmerman

2559

**Locust Patch Kennel
654 Mt. Vernon Road
Gap, PA 17527**

RECEIVED

2007 FEB -5 AM 11:45

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.

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

Yours Sincerely,

Amos J. Stoltzfus
Barbie Ann Stoltzfus

2559

Joe S. Byler
19526 Sweetwater Rd.
Dry Run, PA 17220

2007 FEB -5 AM 11:45

INDEPENDENT REGULATORY
REVIEW COMMISSION

January 30, 2007

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

Dear Chairman Coccodrilli,

I am writing in 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,

Joe S. Byler

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

RECEIVED

2007 FEB -5 AM 11:45

INDEPENDENT REGULATORY
REVIEW COMMISSION

January 20, 2007

Dear Chairman Coccodrilli,

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

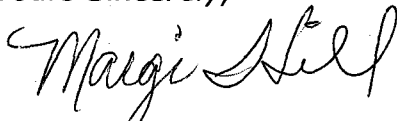
The proposed changes would require the kennel owner to record every time a water bowl or food pan is washed, every time the primary and secondary pen enclosures are cleaned, the feeding and watering dates and times, etc. These excessive and burdensome requirements will require a substantial increase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

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

I sincerely urge that this proposal be rescinded.

Yours Sincerely,



Foxhill Toy Fox Terriers Kennel
1723 Treasure Lake
Dubois, PA 15801

2559

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

RECEIVED

2007 FEB -5 AM 11:45

INDEPENDENT REGULATORY
REVIEW COMMISSION

January 31, 2007

Dear Chairman Coccodrilli,

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

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

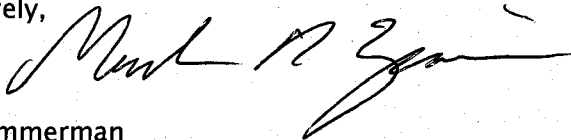
The proposals referencing housing and social interaction of dogs of different sizes are contrary to good husbandry, socializing and training practices. Furthermore, there is no scientific or accepted husbandry basis for the amended space and exercise requirements.

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

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

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

Yours sincerely,



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

2559

Thomas Martin
586 Red Run Rd
East Earl, PA 17519

RECEIVED

2007 FEB -5 AM 11:45

January 30, 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 oppose the Dog Law Regulations Act 225 recently issued on December 16, 2006. The current regulatory proposals in general are unenforceable and extremely onerous when put into practice.

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

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Unless the kennel has purchased, sold, or transferred more than 26 dogs in a calendar year to the individual, it is impossible for the kennel to know if the individual is required to have a Pennsylvania kennel license.

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,

Thomas Martin

2559

A. A. Ridgewood Kennels II
135 W. Lancaster Ave
Downingtown, PA 19335

RECEIVED

2007 FEB -5 AM 11:45

January 20, 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 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,

Holly Young
owner

2559

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

RECEIVED

2007 FEB -5 AM 11: 44

INDEPENDENT REGULATORY
REVIEW COMMISSION

January 31, 2007

Dear Chairman Coccodrilli,

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

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

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

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

Yours truly, *Jacob J. L. Beyler*

Rocky Ridge Kennel
19556 Stony Rd
Willow Hill, PA 17271

2559

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

RECEIVED

2007 FEB -5 AM 11:44

INDEPENDENT REGULATORY
REVIEW COMMISSION

January 22, 2007

Dear Chairman Coccodrilli,


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

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

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

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

Yours truly,



Petology
862 Plaza Blvd.
Lancaster, PA 17601

2559

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

RECEIVED

2007 FEB -5 AM 11:50

INDEPENDENT REGULATORY
REVIEW COMMISSION

January 31, 2007

Dear Chairman Coccodrilli,

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

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

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

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

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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,



Amos W. Zimmerman Jr.
937 Glenwood Drive
Ephrata, PA 17522

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

January 31, 2007

2559

RECEIVED

2007 FEB -5 AM 11:50

Dear Chairman Coccodrilli,

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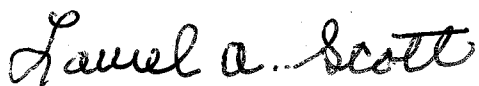
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The current proposed appears to be over idealistic in term of improving the welfare of dogs. I urge that this proposal be rescinded and an approach similar to the USDA standards be developed.

Yours truly,

Laurel A Scott



RR 2 Box 323
Gillett, PA 16925

2559

Lucanna Kennels
202 Rebecca Ln
Coatesville, PA 19320

RECEIVED

2007 FEB -5 AM 11:49

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.

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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,

Luc & Karen Gughelini

2559

Independent Regulatory Review Commission

Attn: Arthur Coccodrilli, Chairman

333 Market Street, 14th Floor

Harrisburg, PA 17101

RECEIVED

2007 FEB -5 AM 11:49

INDEPENDENT REGULATORY
REVIEW COMMISSION

January 24, 2007

Dear Chairman Coccodrilli,

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

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

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

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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,

Mary E. Ehrenberger, Owner
Whispering Winds Boarding Kennel
826 Whitestown Rd
Butler, PA 16001

2559

Lynnhill Llewellyn Setters
16192 Lynn Rd
Saegertown, PA 16433

RECEIVED

2007 FEB -5 AM 11:49

INDEPENDENT REGULATORY
REVIEW COMMISSION

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

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.

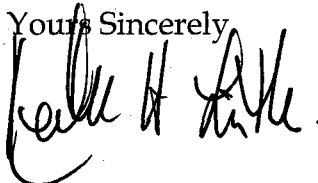
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I sincerely urge that this proposal be rescinded and the USDA standard be adopted in Pennsylvania.

Yours Sincerely

 President.

2559

Barclay Kennel
1236 Fitzwatertown Rd
Abington, PA 19001

RECEIVED

2007 FEB -5 AM 11:48

January 22, 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 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.

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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,

2559

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

RECEIVED

2007 FEB -5 AM 11:48

INDEPENDENT REGULATORY
REVIEW COMMISSION

January 19, 2007

Dear Chairman Coccodrilli,

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

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

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

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

Yours truly,



Michael & Vonnie Chapman
590 North Lime Street
Elizabethtown, PA 17022

2559

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

RECEIVED

2007 FEB -5 AM 11:48

INDEPENDENT REGULATORY
REVIEW COMMISSION

January 31, 2007

Dear Chairman Coccodrilli,

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

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

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

I sincerely urge that this proposal be rescinded.

Yours Sincerely,

Florence J Horst

Horst's Tiny Terriers
145 Mountain View Rd
Shippensburg, PA 17257

2559

RECEIVED

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

2007 FEB -5 AM 11: 48

INDEPENDENT REGULATORY
REVIEW COMMISSION

January 31, 2007

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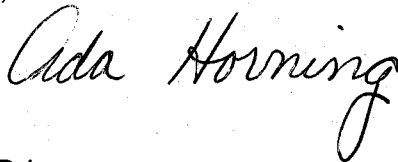
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I sincerely urge that this proposal be rescinded.

Yours Sincerely,



Ada Horning
78 Centennial Rd
Mifflinburg, PA 17844

2559

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

RECEIVED

2007 FEB -5 AM 11:48

INDEPENDENT REGULATORY
REVIEW COMMISSION

January 31, 2007

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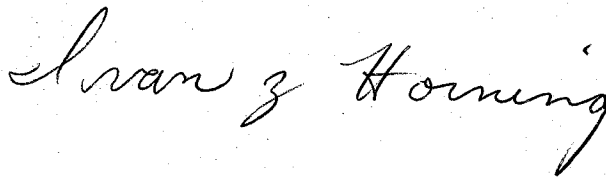
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I sincerely urge that this proposal be rescinded.

Yours Sincerely,



Ivan Z. Horning
78 Centennial Rd.
Mifflinburg, PA 17844

2559

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

January 27, 2007

Dear Chairman Coccodrilli,

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

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

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

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

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

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

Yours sincerely,

Beverly A. Holt
Winterest Kennels
305 Winterset Rd
Ebensburg, PA 15931

RECEIVED
2007 FEB -5 AM 11:47
INDEPENDENT REGULATORY
REVIEW COMMISSION

2559

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

RECEIVED

2007 FEB -5 AM 11:47

INDEPENDENT REGULATORY
REVIEW COMMISSION

January 22, 2007

Dear Chairman Coccodrilli,

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

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

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

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

Yours truly,



Edwin Peachy
262 Shade Hollwo Rd
Salisbury, PA 15558

2559

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

RECEIVED

2007 FEB -5 AM 11: 47

INDEPENDENT REGULATORY
REVIEW COMMISSION

January 31, 2007

Dear Chairman Coccodrilli,

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

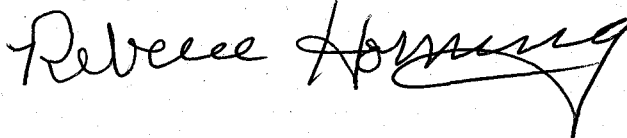
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I sincerely urge that this proposal be rescinded.

Yours Sincerely,



Rebecca Horning
1647 Union Grove Rd
East Earl, PA 17519

2559

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

RECEIVED

2007 FEB -5 AM 11:47

INDEPENDENT REGULATORY
REVIEW COMMISSION

January 23, 2007

Dear Chairman Coccodrilli,

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

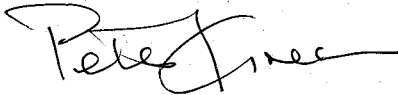
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I sincerely urge that this proposal be rescinded.

Yours Sincerely,



Greenfield Kennel #1
1183 Reading Rd
Bowmansville, PA 17507

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

RECEIVED

2007 FEB -5 AM 11:47

INDEPENDENT REGULATORY
REVIEW COMMISSION

January 24, 2007

Dear Chairman Coccodrilli,

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

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

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

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

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

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

Yours sincerely,

James E and Diane L Burkholder

Whispering Spring Kennel
316 Good Rd
East Earl, PA 17519

2559

Janet H. Martin
250 Gehman Rd
Narvon, PA 17555

RECEIVED

2007 FEB -5 AM 11:47

January 30, 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 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,

Janet H Martin

2559

Ability Kennel
531 S. Crawford Rd
Hummelstown, PA 17036

RECEIVED

2007 FEB -5 AM 11:47

INDEPENDENT REGULATORY
REVIEW COMMISSION

January 20, 2007

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

Dear Chairman Coccodrilli,

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

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

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

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

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

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

Sincerely,

John Chokron

owner Ability Kennels

Looks Like Rendell Screwed up Again.

2559

Rueben Z Martin
526 Quarry Rd.
New Holland, PA 17557

RECEIVED
2007 FEB -5 AM 11: 52

January 30, 2007

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

INDEPENDENT REGULATORY
REVIEW COMMISSION

Dear Chairman Coccodrilli,

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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,

Rueben Z Martin

2559

**KILDARE KENNEL
10323 HOLLIS RD
MEADVILLE, PA 16335**

RECEIVED

2007 FEB -5 AM 11: 52

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

INDEPENDENT REGULATORY
REVIEW COMMISSION

January 23, 2007

Dear Chairman Coccodrilli,

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

Yours Sincerely,

John Kliest

Tane Kliest

We are lobby leaders of AKC reg. Tibetan Terriers for 25 years. We comply with all AKC regulations as well as all PA Dept. of Ag. dog laws. Please rescind ACT 225

2559

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

RECEIVED

2007 FEB -5 AM 11:52

INDEPENDENT REGULATORY
REVIEW COMMISSION

January 31, 2007

Dear Chairman Coccodrilli,

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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.

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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,

Leon Zimmerman

Leon Zimmerman
RD 2 Box 36-B
Martinsburg, PA 16662

2559

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

RECEIVED
2007 FEB -5 AM 11: 52
INDEPENDENT REGULATORY
REVIEW COMMISSION

January 31, 2007

Dear Chairman Coccodrilli,

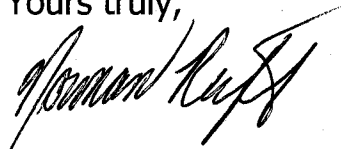
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The current proposed appears to be over idealistic in term of improving the welfare of dogs. I urge that this proposal be rescinded and an approach similar to the USDA standards be developed.

Yours truly,



Norman Reiff
11560 State Rt 44
Watsontown, PA 17777

2559

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

January 27, 2007

Dear Chairman Coccodrilli,

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

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

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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,

Woodbine Kennels - Marie Lou

Woodbine Boarding Kennels
341 ~~1335~~ Tears Rd
Mansfield, PA 16933

INDEPENDENT REGULATORY
REVIEW COMMISSION

2007 FEB -5 AM 11:52

RECEIVED

2559

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

RECEIVED

2007 FEB -5 AM 11:52

INDEPENDENT REGULATORY
REVIEW COMMISSION

January 31, 2007

Dear Chairman Coccodrilli,

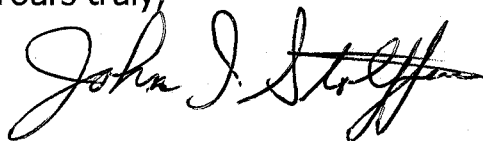
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Yours truly,



Rocky Ridge Kennel
774 Evans Road
Narvon, PA 17555

2559

RECEIVED

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

2007 FEB -6 PM 2:16

INDEPENDENT REGULATORY
REVIEW COMMISSION

Dear Ms. Bender:

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. Many are impractical, excessively burdensome and costly, unenforceable, and/or will not improve the quality of life for the dogs in these kennels.

- * 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.
- * 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 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.
- * The proposals pertaining to housing and social interaction of dogs of different sizes are contrary to good husbandry, socialization and training practices.

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.

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Sincerely,

Charles V. ...
85 ... Ave
Jeffersonville Pa.
19403

2559

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

RECEIVED

2007 FEB -6 PM 2:16

INDEPENDENT REGULATORY
REVIEW COMMISSION

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Sincerely,

Joanne Schmidt
215 Wreck Lane
Leesport, Pa. 19533

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Pennsylvania Department of Agriculture
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Harrisburg, PA 17110-9408

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Sincerely,

Linda Royer
3357 Tolchester Landing
Macungie PA 18062

2559

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Pennsylvania Department of Agriculture
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Harrisburg, PA 17110-9408

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Sincerely,

Carol M. White
3815 Broadway
Allentown PA 18104

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

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Sincerely,

Wanda Hornsby
691 Bucks Rd
Perkasie Pa 18944

2559

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

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Sincerely,

Alex Brown
3358 Bradford Dr
Bethlehem, PA 18017

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

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Mary Berlin
3358 Beaudry Dr
Belleville Pa 18017

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2301 North Cameron Street
Harrisburg, PA 17110-9408

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Sincerely,

Sylvia J. Kuntz
4465 Charles St.
Earlton, PA 18045

2559

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

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INDEPENDENT REGULATORY
REVIEW COMMISSION

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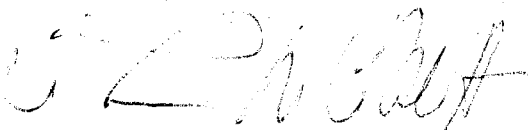
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RR4 Ex 409

Stroudsburg PA

8300

2559

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Sincerely,

Faye Hillborn
1035 Schoolhouse Rd
Pottstown, PA
19465

2559

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John Duggan
50 Estate Rd.
Bayern PA 19512