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

2007 FEB -5 PM 1:44

INDEPENDENT REGULATORY
 REVIEW COMMISSION

Dear Ms. Bender:

My name is Michael A Sankovich, I Live at 3635 Carlisle Road Dover, York County Pennsylvania. I have been involved in dogs both pure bred and rescues for over 40 years. Currently and for the last 7 years I have been involved in exhibiting and more recently breeding Champion line Briard dogs. I am writing this as an objection to certain proposed changes in the dog law and people like myself, who are involved in the fancy of rare breed dogs.

A little history of the breed:

The Briard is an old breed of French sheep herding dog. They first came to this country when The General Lafayette presented Thomas Jefferson with a pair after the American Revolution. American Kennel Club Records indicate that, the breed is in the bottom 25 of all breeds registered with the AKC. Therefore the gene pool for this breed is not a large one, and the breed is continued by mostly "Hobby breeders" and only a few "kennels" as defined by your definitions. By popularity, as ranked by AKC litter registrations the breed is not one that would be commercially attractive for larger kennels to breed. The breed commonly has large litters as do many of the larger breeds of dogs.

Proposed changes would classify me as a "kennel" if I had 2 litters in one year in combination with the other dogs on my premises. (note; if friends visit me with their dog, dogs, under the proposed changes, would be counted as dogs in and out of my premises), toward that magical number of 26 defining me as a kennel. Not only would I have to comply with this classification. But I would also have to provide kennel facilities for each and every dog that may inhabit my home no matter how short of a time period that it occupies my home. This provision is INSANE, makes no sense and is meant to discourage ANY breeding in the home.

My dogs are all raised and socialized inside of my home. Classifying me, and many other pure breed fanciers as Kennels, would force me and others to place our dogs in kennel situations, instead of a home raised and socialized situation. We, as mom and Pop dog breeders, simply cannot and would not conform to the regulations if we are classified as kennels, we would simply disappear (which seems to be the aim of the groups who advocate these changes in the law, under the disguise of stopping puppy mills)

This would further narrow the gene pool resulting in problems with the breed, and all of the less popular breeds with already low gene pools. The PA Dept. of Agriculture should recognize the necessity of diversity, in any breeding program. These changes would favor the breeder of small and toy breeds as they (with typical litters of less than 4 puppies) could continue to breed 4,5,6 litters and still not be classified a kennel. Puppies normally are only on my premises until they are 8 weeks old, and have been placed in homes with families across this nation.

The majority if dogs, shown at dog shows are bred and raised in homes, and the sport brings millions of dollars to the PA economy, (hotels, Restaurants, fuel, and retail sales by dog fanciers.) The loss of the rare breeds will lessen the attractiveness of the shows. Less people =Less Revenue. When these breeds disappear the only ones to be breeding will be commercial kennels, who can pay all of the licensing fees and meet all of the "kennel" requirements as defined by the state law changes. They will not breed the less popular breeds as there would be no profit in it. Genetic health concerns will not be an issue as the purchaser would return it the dog, like a toaster or defective product, in exchange for another. They would only produce the popular breeds as that is where the profit is. The diversity of breeds would narrow to "a field full of Daisies and not a black eyed Susan in the Bunch"

I also agree with the Pa Federation of Dog Clubs with all of their disagreements as they are punitive to me and many friends in the fancy. on issues that define

"Temporary housing", "amended space and exercise requirements", The proposals pertaining to housing and social interaction of dogs of different sizes are contrary to good husbandry, socialization and training practices. 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,

Michael A Sankovich



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Dover, PA 17315