

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 2:15

INDEPENDENT REGULATORY
REVIEW COMMISSION

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- * The obligations of owners of "temporary housing" which are made subject to inspection by the proposal are not enumerated or limited.
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- * 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,

Sandra Huggens
50 Estate Rd
Berwyn, PA 19512

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Lorraine Tidgett
607 Fawn Rd
Jim Hripe, PA 15229

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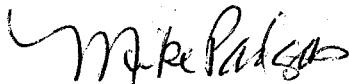
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67 FINE RD. JIM TOWNE PA 18229

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Marcia Lauff PhD
4475 Farm Dr.
Allentown PA 18104

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Larry Wilson

1102 Jarvis Ln

Lansdale PA 19446

215-348-7298 1

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Lynn Meyer
450 Dieberts Vally Rd.
Sch. Haven, PA 17972

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Shirley E. Meyer
300 Chestnut St.
Mar Lin, PA 17951

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J. Mansueti
P.O. Box 399
Kunkletown Pa 18058

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Diana Cognigni
63 Scott St
Plaino, PA 18705
822-9815

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Sandra J. Lord
1957 Church Rd.
Mountaintop, PA
18707

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Steven M Eckert
25 Brier Drive
Pottsville, PA. 17901
(570) - 544-9663

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Linda D. Paul
7 Union Street
Catasauqua, Pa. 18032

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INDEPENDENT REGULATORY
REVIEW COMMISSION

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Sincerely,

Amy M. Eckert
25 Brier Drive
Pottsville, Pa 17901
1 570-544-9603

2559

RECEIVED

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

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Sincerely,

Carol Gagliardi (Carol Gagliardi)
34 LARKER ST.
LARKSVILLE, PA. 18704

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Pennsylvania Department of Agriculture
2301 North Cameron Street
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Pamela Krieger
344 Rimrock Drive
Stroudsburg, PA 18360

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

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Sincerely,

Cynthia M. Kemmerer
404 FAIRVIEW ST
EMMAUS, PA 18049

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

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Sincerely,

Prague Whitham
1757 Victoria Circle
Allentown, Pa 18123
1

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

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Sincerely,

Joan M. Fisher
6765 Sweetwood Dr
Mt Airy Pa. 18062
Wildlife Rehabilitation

2559

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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

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Sincerely,

Kathleen Dyck
15078

no address

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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Sincerely,

Lindy Hummel
3889 Wood Dr
Warrington PA 18988

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

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Sincerely,

LESLIE ZIMMER

PO BOX 73

DURHAM PA

1 18039

2559

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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 -6 PM 2:14

INDEPENDENT REGULATORY
REVIEW COMMISSION

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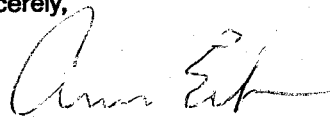
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100 Park Ridge Dr

Bath Pa 18014

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Esther J. Gill
118 So. 13th St.
H. Clearwater, PA 18102

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Pennsylvania Department of Agriculture
2301 North Cameron Street
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M. Kathleen Malavoda
304 Oak Rd
Crags Bath, PA
18014

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REVIEW COMMISSION

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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.

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,

Debra M. Warner
P.O. Box 89
Reinholds, Pa. 17569

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 2:14

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.

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

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

Sincerely,

Deborah & Knappinger
726 East Main St.
Harrisburg PA 17102

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 2:14

INDEPENDENT REGULATORY
REVIEW COMMISSION

Dear Ms. Bender:

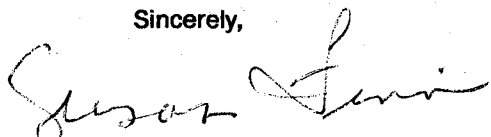
I am writing to comment on the proposed amendments to the Pennsylvania dog law regulations issued on December 16, 2006. I believe that inhumane and substandard kennel conditions should not be tolerated, but I do not agree that most of the proposed regulatory changes are needed, or would necessarily have 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.

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,


134 Blackwood-Branshaw Rd
Sewell, NJ 08080

RECEIVED

Bureau Of Dog Law Enforcement 2007 FEB -6 PM 2: 43 January 26,2007
Attn: Ms. Mary Bender
Pennsylvania Department of Agriculture INDEPENDENT REGULATORY
2301 North Cameron Street REVIEW COMMISSION
Harrisburg, PA 17110-9408

We are writing to comment on the proposed amendments to the Pennsylvania Dog law regulations issued Dec. 16, 2006. We have had dogs all our lives, but our proudest year was when we decided to register our kennel with A.K.C. to protect our kennel name. We have held our K-1 license with Luzerne County for twelve years and since 2006 have a boarding license. In our attempt to help educate, yes educate, the average dog owner we know we have done our very best to better owners and the dog's every day existence. This is why we believe that inhumane and substandard kennel conditions should not be tolerated. Owning and showing dogs for licensed breeders is done for the love of the dogs, the continuous joy in years of line breeding and the thrill of finishing a dog in the Bred-by class at A.K.C. dog shows. Small breeders spend their days with great pride in their efforts of their hobby and show breeding, making sure every step has been taken for the betterment of all their dogs and puppies. Most of the proposed regulatory changes are impractical, excessively burdensome and costly, unenforceable and/or will not improve the quality of life for the dogs in these kennels.

Smaller breeders and dog owners who maintain their own private residential premises but are covered by the Pennsylvania dog law, who provide care and conditions far superior to those required by the 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 proposal pertaining to housing and social interaction of dogs of different sizes are contrary to good husbandry, socialization and training practices.

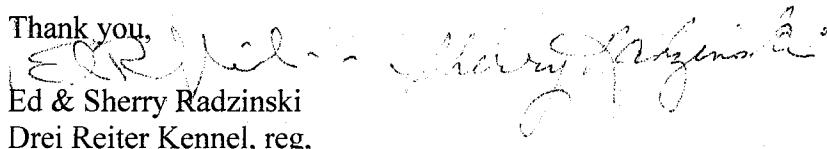
The above is far from a complete list of the deficiencies with the proposed regulations. I also associate myself with the more detailed comments on this proposal by the Pennsylvania Federation of Dog Clubs.

The American Kennel Club and the Pennsylvania Federation of Dog Clubs strongly support humane treatment of dogs, including an adequate and nutritious diet, clean water, clean living conditions, regular veterinary care, kind and responsive human companionship, and training in appropriate behavior. These are our guidelines and along with common sense have made us successful owner/breeders of our dogs. However we do not believe that the proposed changes will achieve these aims, instead enactment of these regulations would burden responsible breeders. Many of the regulations are

impractical, unenforceable, and costly and will not improve the quality of life for dogs in Pennsylvania.

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 of accepted canine husbandry practices. We urge that this proposal be withdrawn.

Thank you.


Ed & Sherry Radzinski
Drei Reiter Kennel, reg,
96 Outlet Road
Dallas, PA 18612

RECEIVED

Dear Ms. Bender,

2007 FEB -6 PM 2: 44

My name is Tom Pribilla, (14 Pine Meadow Drive, Pine Grove, PA 17963) and I am highly involved in the rescue and fostering of dogs. In 2006, my husband I have fostered and adopted out over 25 dogs.

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 not 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 the kennels.

I feel that your proposal about "temporary housing" is totally absurd. There is no scientific or accepted husbandry basis for the amended space and exercise requirements. Many of the rescue dogs that are brought in out of horrendous conditions are thankful for the warm home and food that we provide and are content with the amount of exercise they are receiving.

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. In addition, all of this wasted time is taking away from the time spent with the dogs.

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 this proposal be withdrawn. PLEASE consider all the rescue dogs who will no longer have a foster home to go to and face death due to your newly proposed regulations.

Sincerely,

Tom Pribilla
14 Pine Meadow Drive,
Pine Grove, PA 17963

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

RECEIVED

Dear Ms. Bender,

2007 FEB -6 PM 2:44

My name is Kim Pribilla, (14 Pine Meadow Drive, Pine Grove, PA 17963) and I am highly involved in the rescue and fostering of dogs. In 2006, my husband I have fostered and adopted out over 25 dogs.

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 not 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 the kennels.

I feel that your proposal about "temporary housing" is totally absurd. There is no scientific or accepted husbandry basis for the amended space and exercise requirements. Many of the rescue dogs that are brought in out of horrendous conditions are thankful for the warm home and food that we provide and are content with the amount of exercise they are receiving.

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. In addition, all of this wasted time is taking away from the time spent with the dogs.

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 this proposal be withdrawn. PLEASE consider all the rescue dogs who will no longer have a foster home to go to and face death due to your newly proposed regulations.

Sincerely,

Kim Pribilla

Kim Pribilla

14 Pine Meadow Drive,
Pine Grove, PA 17963

2559

Brookside Pups And Stuff Too
Rt 93 3455 Valmont Parkway
Hasleton, PA 18202

RECEIVED

2007 FEB -6 PM 2:46

INDEPENDENT REGULATORY
REVIEW COMMISSION

January 31, 2007

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

Dear Ms. Bender,

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

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

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

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

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

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

Sincerely,



2559

Elias S. King
329-A Centerville Rd
Gordonville, PA 17529

RECEIVED

2007 FEB -6 PM 2:46

INDEPENDENT REGULATORY
REVIEW COMMISSION

January 26, 2007

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

Dear Ms. Bender,

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

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

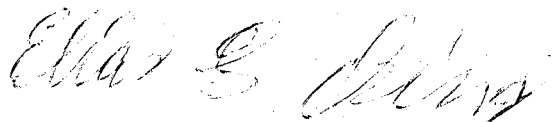
The bureau already requires the name, address, acquisition date, disposition date, type of sale, breed, sex, color, whelping date, and identification number be recorded for each and every dog sold, transferred, adopted, or given away. If the department wishes to enforce the law, they already have all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



RECEIVED

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

2007 FEB -6 PM 2:44

INDEPENDENT REGULATORY
REVIEW COMMISSION

January 24, 2007

Dear Ms. Bender,

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

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

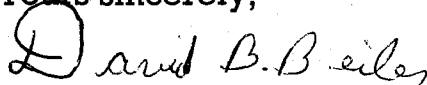
The proposals referencing housing and social interaction of dogs of different sizes are contrary to good husbandry, socializing and training practices. Furthermore, there is no scientific or accepted husbandry basis for the amended space and exercise requirements.

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

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

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

Yours sincerely,



Whispering Pines Kennel
12887 Sandy Mount Rd
Orrstown, PA 17244

2559

Brinlann Great Danes
271 River Rd
Auburn, PA 17922

RECEIVED

2007 FEB -6 PM 2:44

INDEPENDENT REGULATORY
REVIEW COMMISSION

January 31, 2007

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

Dear Ms. Bender,

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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.

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,

Brian J. Wetmore

2559

RECEIVED

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

2007 FEB -6 PM 2:44

INDEPENDENT REGULATORY
REVIEW COMMISSION

January 24, 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 sincerely,

Weeping Willow Kennel
250 Gehman Rd
Narvon, PA 17555

2559

RECEIVED

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

2007 FEB -6 PM 2: 44

INDEPENDENT REGULATORY
REVIEW COMMISSION

January 24, 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 sincerely,



Weaverland Kennel
1512 Weaverland Rd
East Earl, PA 17519

2559

Enos King
221 Old Dam Road
Christiana, PA 17509

RECEIVED

2007 FEB -6 PM 2:44

INDEPENDENT REGULATORY
REVIEW COMMISSION

January 26, 2007

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

Dear Ms. Bender,

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

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

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,

Enos K. King Jr.

2559

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

RECEIVED

2007 FEB -6 PM 2:44

INDEPENDENT REGULATORY
REVIEW COMMISSION

January 22, 2007

Dear Ms. Bender,

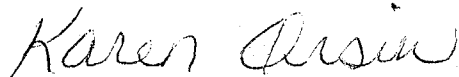
I am writing to comment on the proposed amendments to the Dog Law Regulations Act 225 issued on December 16, 2006. I personally think that many of the changes are impractical and burdensome, and will not improve the quality of life for dogs in kennels.

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

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

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

Yours truly,



Petite Pups Kennel
4669 Long Run Rd
Loganton, PA 17747

2559

RECEIVED

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

2007 FEB -6 PM 2:43

INDEPENDENT REGULATORY
REVIEW COMMISSION

January 26, 2007

Dear Ms. Bender,

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

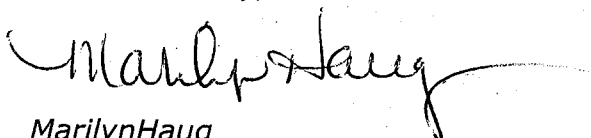
The proposed changes would require the kennel owner to record every time a water bowl or food pan is washed, every time the primary and secondary pen enclosures are cleaned, the feeding and watering dates and times, etc. These excessive and burdensome requirements will require a substantial increase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

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

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

I sincerely urge that this proposal be rescinded.

Yours Sincerely,



Marilyn Haug
296 South Vintage Road
Paradise, PA 17562

2559

Trudy Brubacker
~~R.R. Box 255~~ 439 PALLAS RD
Mount Pleasant Mills, PA 17853

January 31, 2007

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

RECEIVED
2007 FEB -6 PM 2:43
INDEPENDENT REGULATORY
PENNY COMMISSION

Dear Ms. Bender,

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

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

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

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

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

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

Sincerely, *Trudy Brubacker*

2559

*Bresslers Foxhound Kennel
187 Davis Rd
Olanta, PA 16863*

RECEIVED

2007 FEB -6 PM 2:21

INDEPENDENT REGULATORY
REVIEW COMMISSION

January 31, 2007

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

Dear Ms. Bender,

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

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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

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

RECEIVED

2007 FEB -6 PM 2:20

INDEPENDENT REGULATORY
REVIEW COMMISSION

January 26, 2007

Dear Ms. Bender,

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

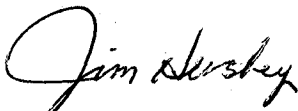
The proposed changes would require the kennel owner to record every time a water bowl or food pan is washed, every time the primary and secondary pen enclosures are cleaned, the feeding and watering dates and times, etc. These excessive and burdensome requirements will require a substantial increase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

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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,



Jim Hershey
338 Sunnyburn Rd
Elizabethtown, PA 17022

2559

RECEIVED

2007 FEB -6 PM 2:18

INDEPENDENT REGULATORY
REVIEW COMMISSION

Bureau of Dog Law Enforcement
Attn: Ms Mary Bender
Pennsylvania Department of Agriculture
2301 North Cameron Street
Harrisburg, PA 171109408

Dear Ms Bender:

I am writing to you because I am concerned with the proposed amendments to the Pennsylvania Dog Law Regulations issued on December 16, 2006. I believe that proper regulation of kennels is necessary but I question the extent to which these laws go.

As a pet owner who uses boarding kennels I question the effects of this law on the current boarding kennels. How many kennels currently in business meet the requirements as listed? Would these new laws force the closure of smaller boarding facilities and a dramatic increase in the price of boarding my pets as other facilities spend a lot of money to meet the new building specifications? Would it also make it more difficult to find a boarding kennel if these new regulations force existing kennels to close?

Section 21.23 imposes extreme requirements as to space, exercising and record keeping..

The intense record keeping required here and in other parts of the act make it almost a full time job keeping up the paperwork. Wouldn't these requirements increase the need for personnel at a boarding facility, thereby increasing my costs? Is it really necessary to keep detailed accounts of every time a water dish is changed? Surely better use can be made of kennel personnel's time.

Section 21.23 also says that dogs of different size can not be exercised together. Currently if I have two dogs who live together they can be placed in the same run when boarded, if these two dogs are of different sizes this will no longer be possible. This will increase my expense as discounts are usually given if two dogs are boarded in the same run. If my dogs live together in my home why shouldn't they be allowed to be together when boarded? I would prefer they have the security of being together when separated from me.

Under the proposed regulations pets who are boarded but of different size would not even be able to play together at the Kennel. Animals that live together in my home all the time and are comfortable together should be able to interact together if it is necessary to board them.

Section 21.28 says food receptacles cannot be made of materials that a dog can destroy. This precludes a kennel from using disposable paper containers to feed dogs. What could be more sanitary than containers which are not reused? The time spent cleaning metal food dishes is time staff can't use doing other things. The kennel where I now board uses paper for feeding boarders. I am very pleased with this.

I ask that these recommendations not be accepted and that the board seek the opinions of those who are actively involved in breeding and caring for dogs. How many people from such backgrounds were involved in the creation of these changes?

I urge the withdrawal of the current proposal and an open dialogue with the groups in the state that are actively involved in the breeding and care of dogs prior to any new proposals being introduced.

Sincerely,

Ronald J Meffle
740 E TIOGA ST
ALLEN TOWN, PA 18103

2559

RECEIVED

2007 FEB -6 PM 2:18

Bureau of Dog Law Enforcement
Attn: Ms Mary Bender
Pennsylvania Department of Agriculture
2301 North Cameron Street
Harrisburg, PA 171109408

INDEPENDENT REGULATORY
REVIEW COMMISSION

Dear Ms Bender:

I am writing to you because I am concerned with the proposed amendments to the Pennsylvania Dog Law Regulations issued on December 16, 2006. I believe that proper regulation of kennels is necessary but I question the extent to which these laws go.

As a pet owner who uses boarding kennels I question the effects of this law on the current boarding kennels. How many kennels currently in business meet the requirements as listed? Would these new laws force the closure of smaller boarding facilities and a dramatic increase in the price of boarding my pets as other facilities spend a lot of money to meet the new building specifications? Would it also make it more difficult to find a boarding kennel if these new regulations force existing kennels to close?

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I ask that these recommendations not be accepted and that the board seek the opinions of those who are actively involved in breeding and caring for dogs. How many people from such backgrounds were involved in the creation of these changes?

I urge the withdrawal of the current proposal and an open dialogue with the groups in the state that are actively involved in the breeding and care of dogs prior to any new proposals being introduced.

Sincerely,

Suzanne Nied
36 Carpenter Rd
Harrisburg, Pa 171618

2559

RECEIVED

207 FEB -6 PM 2:16

INDEPENDENT REGULATORY
REVIEW COMMISSION

Bureau of Dog Law Enforcement
Attn: Ms Mary Bender
Pennsylvania Department of Agriculture
2301 North Cameron Street
Harrisburg, PA 171109408

Dear Ms Bender:

I am writing to you because I am concerned with the proposed amendments to the Pennsylvania Dog Law Regulations issued on December 16, 2006. I believe that proper regulation of kennels is necessary but I question the extent to which these laws go.

As a pet owner who uses boarding kennels I question the effects of this law on the current boarding kennels. How many kennels currently in business meet the requirements as listed? Would these new laws force the closure of smaller boarding facilities and a dramatic increase in the price of boarding my pets as other facilities spend a lot of money to meet the new building specifications? Would it also make it more difficult to find a boarding kennel if these new regulations force existing kennels to close?

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I ask that these recommendations not be accepted and that the board seek the opinions of those who are actively involved in breeding and caring for dogs. How many people from such backgrounds were involved in the creation of these changes?

I urge the withdrawal of the current proposal and an open dialogue with the groups in the state that are actively involved in the breeding and care of dogs prior to any new proposals being introduced.

Sincerely,

Elizabeth Miller
3409 Lewis Ave
Northampton, PA 18062

2559

February 5, 2007

Arthur Coccodrilli, Chairman
Independent Regulatory Review Commission
333 Market St., 14th floor
Harrisburg, PA 17101
Fax#717-783-2664

RECEIVED

2007 FEB -5 PM 3:27

INDEPENDENT REGULATORY
REVIEW COMMISSION

RE: Pennsylvania Puppy Mills

Dear Mr. Coccodrilli,

I am writing you as an animal lover of Pennsylvania. For years I have not purchased any dog or cat from any pet store due to the terrible conditions associated with "puppy mills" especially in Pennsylvania, the "puppy mill capital of the East".

Last December, changes were suggested to improve kennel regulations used to inspect commercial breeding operations here in Pennsylvania. Don't you think dogs deserve more space to move around, to be protected from rain, snow, wind, and bitter cold or excess heat, and time to socialize and exercise? I definitely do. A dog, when welcomed into a family, becomes part of that family. I think most people would be horrified if they knew some of the treatment their four legged family members received prior to being bought into their homes, especially since a lot of this treatment affects their health and behavioral attitudes later in the dog's life.

Please let us all help these animals that have no voice for themselves. Let us give them the humane treatment they deserve and start their lives off knowing that humans are caring givers and not something to be feared.

Thank you for taking the time to listen.

Sincerely,



Renee Reynolds

cc Department of Agriculture Bureau of Dog Law Enforcement
Senator Arlen Specter
Representative Jim Gerlach

**To: Arthur Coccodrilli, Chairman
Independent Regulatory Review Commission**

Fax Number: 717-783-2664

**From: Renee Reynolds
85 Butlers Ln
Mohnton, PA 19540**

Date: February 5, 2007

RE: Pennsylvania Puppy Mills

Page 1 of 2

Feb. 1.07

Mountain Side Dog Kennel
HCR 61 Box 541
Mill Creek, PA 17060

2559

RECEIVED

January 26, 2007

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

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 Suarez
Mountain Side Dog Kennel

Schrock's General Store
43342 Penoyer Rd
Spartansburg, PA 16434

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

RECEIVED

2007 FEB -5 AM 11:49

January 31, 2007

2559

INDEPENDENT REGULATORY
REVIEW COMMISSION

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,

Laurence A. Schrock

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

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

Dear Ms. Bender,

I have recently been made aware of the newly proposed Pa Dog law regulations. Yes, inhumane and substandard care and housing should definitely not be tolerated but not at the expense of responsible breeders. *I purchased my dog from a small PA breeder - she was a healthy, well bred & well cared for puppy. I have competed in AKC events with her with much success. She is a much loved member of my family. My small PA breeder has always been available to offer advice or suggestions for any questions I had during this dog's life.*

Under the proposed changes as I read them, small scale breeders will fall into the same set of requirements as the large commercial operations. Licensed breeders with a K1 license would no longer be able to maintain, breed, whelp and raise their dogs within their homes-but this is exactly the setting from which I want to be able to buy a puppy or dog! I want a dog that was raised in a home from breeders who are careful about the health of their dogs, their temperaments and bred dogs that look like the breed they are supposed to be! These breeders would have to either stop raising dogs or build facilities to meet the commercial breeders' standards which are not the way I want a puppy I'd buy raised. The proposed regulations favor the large scale operations that will have the budget to build these "sterile" kennel facilities and hire staff to maintain the outlined record keeping requirements. Why we don't even require 20 minutes of daily mandated physical exercise for our children in schools but for dogs we do!

I want to be able to buy a dog directly from a reputable breeder, not a pet shop or large scale commercial kennel. I want to know that my puppy was raised in a loving home and exposed to a variety of household situations. I want to be able to buy a dog bred with thought to health, temperament, given lots of human contact and exposed to everyday sights and sounds. I want to be able to buy a dog that was allowed to romp in the grass and was played with by children and around other dogs. This proposal goes against the very pack nature of dogs and their need to socialize with other dogs and humans.

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

Sincerely,

Beverly Raach

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

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

Dear Ms. Bender,

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

As a hobby breeder, exhibitor and obedience dog trainer I say that the problems you seek to address by the PA proposed dog law severely punishes the one resource most dedicated to ensuring the welfare of companion animals; the hobby breeder. We are the only group that attempt to breed good temperaments & improved health. We socialize from birth in a caring home environment and select buyers based on experience, who will make a good home. We are there to help when puppy buyers need advice. Pet stores and puppy mills can never provide this. Without this safety net of dedicated


Under the proposed changes as I read them, small scale breeders will fall into the same set of requirements as the large commercial operations. Licensed breeders with a K1 license would no longer be able to maintain, breed, whelp and raise their dogs within their homes-but this is exactly the setting from which I want to be able to buy a puppy or dog! I want a dog that was raised in a home from breeders who are careful about the health of their dogs, their temperaments and bred dogs that look like the breed they are supposed to be! These breeders would have to either stop raising dogs or build facilities to meet the commercial breeders' standards which are not the way I want a puppy I'd buy raised. The proposed regulations favor the large scale operations that will have the budget to build these "sterile" kennel facilities and hire staff to maintain the outlined record keeping requirements. Why we don't even require 20 minutes of daily mandated physical exercise for our children in schools but for dogs we do!

BREEDERS, FAR MORE ANIMALS WILL END UP IN SHELTERS

I want to be able to buy a dog directly from a reputable breeder, not a pet shop or large scale commercial kennel. I want to know that my puppy was raised in a loving home and exposed to a variety of household situations. I want be able to buy a dog bred with thought to health, temperament, given lots of human contact and exposed to everyday sights and sounds. I want to be able to buy a dog that was allowed to romp in the grass and was played with by children and around other dogs. This proposal goes against the very pack nature of dogs and their need to socialize with other dogs and humans.

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Sincerely,


GEORGE MAKAIRA

February 7, 2007

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

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

Dear Ms. Bender,

I have recently been made aware of the newly proposed Pa Dog law regulations. Yes, inhumane and substandard care and housing should definitely not be tolerated but not at the expense of responsible breeders. We are responsible pet owners who purchased our Chesapeake Bay Retriever from a small breeder. It is breeders like ours that truly love the breed they raise and know the importance of good breeding for not only health, but also temperament. In fact, our small breeder researched stud dogs before having her females bred. She was extremely concerned for the health of the puppies. She also offered to take any of the puppies back if the new owner could not make the new puppy/human relationship work. She is truly a conscientious person who

Under the proposed changes as I read them, small scale breeders will fall into the same set of requirements as the large commercial operations. Licensed breeders with a K1 license would no longer to be able to maintain, breed, whelp and raise their dogs within their homes-but this is exactly the setting from which I want to be able to buy a puppy or dog! I want a dog that was raised in a home from breeders who are careful about the health of their dogs, their temperaments and bred dogs that look like the breed they are supposed to be! These breeders would have to either stop raising dogs or build facilities to meet the commercial breeders' standards which are not the way I want a puppy I'd buy raised. The proposed regulations favor the large scale operations that will have the budget to build these "sterile" kennel facilities and hire staff to maintain the outlined record keeping requirements. Why we don't even require 20 minutes of daily mandated physical exercise for our children in schools but for dogs we do!

I want to be able to buy a dog directly from a reputable breeder, not a pet shop or large scale commercial kennel. I want to know that my puppy was raised in a loving home and exposed to a variety of household situations. I want be able to buy a dog bred with thought to health, temperament, given lots of human contact and exposed to everyday sights and sounds. I want to be able to buy a dog that was allowed to romp in the grass and was played with by children and around other dogs. This proposal goes against the very pack nature of dogs and their need to socialize with other dogs and humans.

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

Sincerely,

Holly B. Hesterman
J. R. Hester

Thank You for your time.

loses the breed. and I can say without a doubt, the all small breeders I have ever known are a credit to the breed they raise. Please reconsider this propo law!! It is our desire to purchase another puppy in the future from the same breeder we can only hope she is still breeding & no prohibited by this new law

cc: Senator Rob Wonderling
24th District

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

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

Dear Ms. Bender,

I have recently been made aware of the newly proposed Pa Dog law regulations. Yes, inhumane and substandard care and housing should definitely not be tolerated but not at the expense of responsible breeders. *This amendment will only cause the 'puppy mill' people to hide even more than they do now. It does nothing to protect honest breeders of pure bred dogs. This amendment was poorly thought out and it will do more harm than good. Reputable dog breeders are far more careful about their puppies and where and to whom their pups are sold.*

Under the proposed changes as I read them, small scale breeders will fall into the same set of requirements as the large commercial operations. Licensed breeders with a K1 license would no longer be able to maintain, breed, whelp and raise their dogs within their homes-but this is exactly the setting from which I want to be able to buy a puppy or dog! I want a dog that was raised in a home from breeders who are careful about the health of their dogs, their temperaments and bred dogs that look like the breed they are supposed to be! These breeders would have to either stop raising dogs or build facilities to meet the commercial breeders' standards which are not the way I want a puppy I'd buy raised. The proposed regulations favor the large scale operations that will have the budget to build these "sterile" kennel facilities and hire staff to maintain the outlined record keeping requirements. Why we don't even require 20 minutes of daily mandated physical exercise for our children in schools but for dogs we do!

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

Sincerely,

Patricia W Comly

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

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

Dear Ms. Bender,

I have recently been made aware of the newly proposed Pa Dog law regulations. Yes, inhumane and substandard care and housing should definitely not be tolerated but not at the expense of responsible breeders. In the last 30 years I have owned 8 Chesapeake Bay retrievers, 2 border collies, 1 rough collie. They were companions, Bench dancers, obedience competitors and full dogs. Their success was because of their upbringing. It came from dedicated breeders not puppy mills. Please be considerate of the upcoming bill. Not all targeting the way people buy dogs you have before you.

Under the proposed changes as I read them, small scale breeders will fall into the same set of requirements as the large commercial operations. Licensed breeders with a K1 license would no longer be able to maintain, breed, whelp and raise their dogs within their homes-but this is exactly the setting from which I want to be able to buy a puppy or dog! I want a dog that was raised in a home from breeders who are careful about the health of their dogs, their temperaments and bred dogs that look like the breed they are supposed to be! These breeders would have to either stop raising dogs or build facilities to meet the commercial breeders' standards which are not the way I want a puppy I'd buy raised. The proposed regulations favor the large scale operations that will have the budget to build these "sterile" kennel facilities and hire staff to maintain the outlined record keeping requirements. Why we don't even require 20 minutes of daily mandated physical exercise for our children in schools but for dogs we do!

I want to be able to buy a dog directly from a reputable breeder, not a pet shop or large scale commercial kennel. I want to know that my puppy was raised in a loving home and exposed to a variety of household situations. I want to be able to buy a dog bred with thought to health, temperament, given lots of human contact and exposed to everyday sights and sounds. I want to be able to buy a dog that was allowed to romp in the grass and was played with by children and around other dogs. This proposal goes against the very pack nature of dogs and their need to socialize with other dogs and humans.

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

Sincerely,

Lisa Freeman

February 5, 2007

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

Dear Ms. Bender:

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

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

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

Most sincerely,

Carol Flemming
Marathon, FL 33050

February 5, 2007

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

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Most sincerely,



Patricia Jeanschild
126 E. Brown St.

East Stroudsburg, Pa. 18301

February 5, 2007

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

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Most sincerely,

Miss Amanda O'Leary
3056 State Route 119
New Alexandria
Pa.
15670

February 5, 2007

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

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Most sincerely,

*Mr. Richard Burkhardt
Main St.
Johnstown Pa
15906*

Yahoo! Mail - krausj@yahoo.com

February 5, 2007

Ms. Mary Bender

Department of Agriculture

Bureau of Dog Law Enforcement

2301 North Cameron Street

Harrisburg, PA 17110-9408

Dear Ms. Bender:

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Most sincerely,

Kathleen Ann Kadzinski
1240 Barnes Rd
Warminster, Pa. 18974

Kristy L. Holden-Conwell
4 Brentfort Court
Collegeville, PA 19426

2/5/2007

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

Dear Ms. Mary Bender:

I am writing to urge you to support the comments submitted by The Humane Society of The United States relative to improving the conditions in puppy mills in Pennsylvania. It is a travesty that innocent puppies are *brutalized, denied adequate shelter, medical care and quality of life.*

It is time that something is done to prevent the suffering of these utterly defenseless animals.

"The question is not, Can they reason? nor "Can they talk? But rather, "Can they suffer?"-Jeremy Bantham

After the holidays, puppy mills that have not sold the "Christmas puppies" typically euthanize them. Sadly, in a business that is driven by greed (and only greed), they euthanize in the cheapest way. This is horrific for us to think about...One can only imagine what it's like for the little puppies.

Please make Pennsylvania, the cradle of liberty, a safe haven for all helpless puppies and adult dogs. Thank you very much for your consideration.

Sincerely,



Kristy L. Holden-Conwell

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

February 12, 2007

RE: Comments on proposed Dog Law regulations

Dear Ms. Bender,

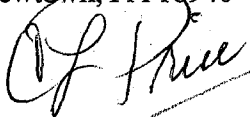
As a concerned citizen of the state of Pennsylvania, I respectfully submit this comment on the proposed changes to the Dog Law regulations.

First, I would like to commend the Department of Agriculture and the Bureau of Dog Law Enforcement for proposing amendments to the Dog Law Regulations to improve conditions for dogs housed and bred in commercial breeding operations in Pennsylvania. **It should also be noted that the proposed changes to the regulations do not bring hobby breeders under the Act. The same people who were exempt from the former regulations (i.e. the act. of 1999 hobby breeders who raise, breed, move, sell, etc. fewer than 26 dogs per year), will continue to be exempt under the revised regulations.**

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

Sincerely,

C. L. Price
33 Birch Court
Newtown, PA 18940



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 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.

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,

Eric Brooks
2589 EASTON TPK
WAYMART Pa 18472

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

Dear Ms. Bender:

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Sincerely,



2-8-2007

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

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Sincerely,

NANCY Ryan
417 16th Ave
Scranton, Penna
18504

~~Handwritten signature~~

HC1 Box 89B
Clifton, PA 18424
February 8, 2007

Dear Ms. Bender:

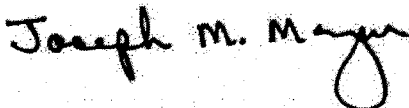
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Sincerely,



Joseph Mazur
HC1 Box 89B Clifton Beach Rd.
Clifton, PA 18424
570-842-5311

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

Dear Ms. Bender:

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Sincerely,

Peggy Ann Setzer
1308 Church St
Moscow, PA 18444

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

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Sincerely,

Harold W. Sizer
1308 Church Street
Moscow, PA 18444

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

February 8 2007

Dear Ms. Bender:

My name is Greg Rouzer of Harrisonville, Pa I enjoy coon hunting, although I don't kill the raccoon, we greatly enjoy the chase. 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.

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I feel you should be straight forward with the puppy mills, and enforce the laws we have NOW !!

Greg Rouzer

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

February 8 2007

Dear Ms. Bender:

My name is Martha Brown, Greencastle, Pa., 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.

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Sincerely,

Mrs. Martha Brown

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

February 8 2007

Dear Ms. Bender:

My name is Catharine Pitman of Mercersburg, Pa. Dear friends of mine have dog kennels that will be impacted badly by the changes the proposed laws include. They take very good care of my dog when I can't. They would need to raise the boarding prices so high, to meet your standards that I couldn't afford to take him there!!! 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.

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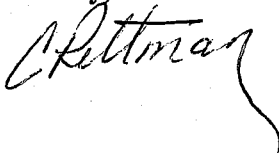
* Smaller breeders and dog owners who maintain their dogs in their own residential premises but are covered by the Pennsylvania dog law, who provide care and conditions far superior to those required by the proposed new standards, would be unable to comply with the rigid commercial kennel standards.

* 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 impact of these changes effect more people than you realize!!~~

Sincerely,





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

February 8 2007

Dear Ms. Bender:

My name is Midge Tressler of 10238 Reeder Rd, Mercersburg, Pa, 17236..Phone # 717-328-3549.I have been in the sport of dogs almost my entire life. I have several dogs that help me work my small farm, trial in Herding; Rally, Obedience events and we enjoy a successful Show life. 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. **I AM VERY CONCERNED THAT REAL DOG OWNERS/LOVERS ARE NOT REPRESENTED IN THIS FORUM.I LOVE MY DOGS AND GO TO GREAT PAINS TO MAINTAIN THEIR HEALTH AND HAPPINESS!!!!**

- * I own both small and large dogs, they exercise together daily on our walks. It is necessary for dogs of all sizes and breeds to socialize together, if they are to be good canine citizens!!**
- * 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.



Midge Tressler

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

February 8 2007

Dear Ms. Bender:

My name is Gloria Sheffield of Mercersburg, Pa. I depend on my dog to watch my house, protect me and keep me company. 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.

* 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.

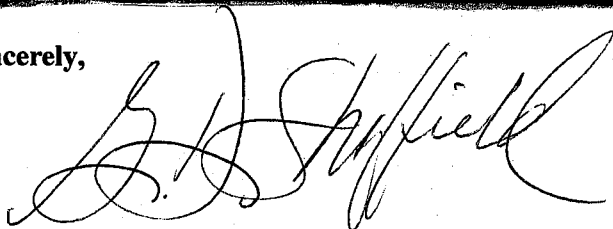
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* Smaller breeders and dog owners who maintain their dogs in their own residential premises but are covered by the Pennsylvania dog law, who provide care and conditions far superior to those required by the proposed new standards, would be unable to 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.

Sincerely,



A thick black horizontal bar is positioned above the signature. The signature itself is written in cursive and reads "G. Sheffield".

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

February 8 2007

Dear Ms. Bender:

My name is Kenneth Rouzer of Harrisonville, Pa I enjoy coon hunting, although I don't kill the raccoon, we greatly enjoy the chase. 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.

* 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.

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* 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.

I feel you should enforce the laws we have NOW, and STOP wasting money on new laws!!

Kenneth Rouzer

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

February 8 2007

Dear Ms. Bender:

My name is Angela Byrne, Mercersburg, Pa. I grew up with lots of show dogs. My Grandmother, Mother and I went to shows together most weekends. The dogs are and were well cared for. 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.

* 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.

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* 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.

~~Once again "Big Brother" is just trying to get more money from us, I don't think it has anything to do with the welfare of the dogs.~~

Angela Byrne

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 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.
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- * 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.

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,

Lisa Rugh

466 N. Main Street

Pittston, PA 18640

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 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.

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Sincerely,

Margie B. Rosa
1006 Clark St
Plover, PA 18641

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 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.

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- * 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.

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,


Louise J. Herzog
HC #1 Box 89B
CLIFTON, PA 18424

Dear Ms. Bender,

My name is Daniel Gillgannon. I live at 335 Larkin Drive in Red Lion. I am a Police K-9 Handler with 2 K-9's and I also am a hobby breeder who breeds one litter of German Shepherds a year.

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.

Examples of problems with the proposal are the following:

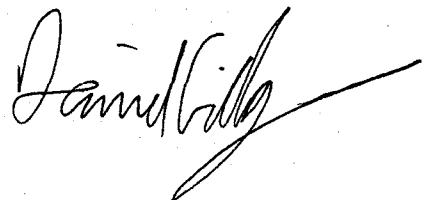
- * The definition of "temporary housing" would require thousands of small residential hobby and show breeding households to become licensed which could not possibly comply with the regulations, and which there is no reason to regulate.
- * The obligations of owners of "temporary housing" which are made subject to inspection by the proposal are not enumerated or limited.
- * There is no scientific or accepted husbandry basis for the amended space and exercise requirements.
- * 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.
- * 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. As a Police K-9 I am required to maintain adequate grounds and living space for my dogs at my own expense. My agency will not help me comply with regulations. Which would mean that if I failed to meet your guidelines I would lose my K-9.
- * 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.

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.

Respectfully,

Daniel Gillgannon



February 1, 2007

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

Dear Ms. Bender:

I am writing to comment on the proposed amendments to the PA Dog Law Regulations issued on December 16, 2006. I believe that any inhumane and substandard conditions dogs are kept in is unacceptable and I don't believe this should be tolerated in our state, but I do not agree that most of the new proposed regulations are needed or would necessarily have a beneficial outcome if they were approved as is. Many of the proposed rules and regulations are impractical, burdensome and costly and unenforceable, and /or will not improve the quality of life for the dogs in these kennels.

Examples of the problems with the proposals are as follows:

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 "temporary housing" which are made subject to the 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 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.

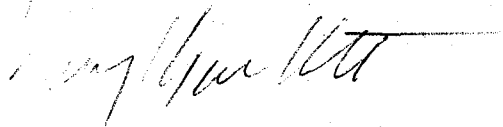
The record keeping requirements with respect to exercise, cleaning, and other aspects of kennel management are excessively burdensome and serve no useful purpose, as it would be impossible to verify their accuracy in all but the most egregious circumstances. Such egregious circumstances already violate 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 deficiencies with the proposed regulations. I also associate myself with the more detailed comments on this proposal by the Pennsylvania Federation of Dog Clubs.

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

Sincerely yours,



Vonnay Ryan Roth

837 Church Rd

Richlandtown Pa 18955

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 actively involved in the sport of purebred dogs and have done so for the last twenty years. I take great care of my animals and have always surpassed current standards for keeping animals. I do not have multiple breeds, take on boarders, or produce hundreds of animals for sale. This is a hobby which I take very seriously and each and every dog is loved and cared for. Therefore, I am writing to comment on the proposed amendments to the Pennsylvania dog law regulations issued on December 16, 2006.

We believe that inhumane and substandard kennel conditions should never be tolerated, but do not agree that a majority of the proposed regulatory changes are needed, or would have the desired outcome. Many are impractical, burdensome, and unenforceable, and will not improve the quality of life for those dogs already in poor situations. In addition to impose such regulation on small hobby breeders who keep a few animals is not practical or logical and caters to small special interest or even radical animal rights groups. If present regulations were enforced, additional staffing provided for that enforcement, and stiffer penalties for infractions enacted, further onerous regulations would not be necessary.

Here are some problems with the proposal as we see it:

- 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.
- There is no scientific or accepted husbandry basis for the amended space and exercise requirements.
- The regulations will require wholesale renovation, if not building, of many kennels already built in compliance with current federal and/or state standards.
- Smaller breeders and dog owners who maintain their dogs in their own homes, 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 which are more appropriately applied to boarding kennels or large wholesale operations.
- The record keeping requirements with respect to exercise, cleaning, and social interaction of dogs, and other aspects of kennel management are excessively burdensome, serve no useful purpose, and would be impossible to verify.

The Bureau has conceded that its current regulations have not been adequately enforced. If, after implementation of recently announced enhanced enforcement program, the Bureau finds it is still unable to prevent inhumane treatment of dogs it should cite specific deficiencies and propose changes based on them or better yet impose case by case punitive measures on the particular establishment or kennel that is in violation. The current proposal appears to be a list of thoughts aimed at improving circumstances for dogs that has no connection to specific instances in which the welfare of dogs could not be secured, and has no basis in scientific fact or accepted canine husbandry practices. We urge that this proposal be withdrawn.

Sincerely,

Cindi & Dave Hassrick
1403 Old Jacksonville Road
Ivyland PA 18974

cc
Robert M. Tomlinson
Senate Box 203006
Harrisburg PA 17120-3006

Scott A. Petri
95 Almshouse Road, Suite 303, The Weather Vane
Richboro, PA 18954

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

January 28, 2007

Dear Ms. Bender:

My name is Stephen E. Gass and I reside at 981 Hoffer Rd, Annville, Pa. I am a member of several Beagle Clubs in this area. I have owned and raised Beagles since my teens and have participated in running them in field trials for over thirty years. As a responsible dog owner I am very concerned about the proposed amendments to the Pennsylvania Dog Law Regulations.

I am writing to comment on the proposed amendments to the Pennsylvania dog law regulations issued on December 16, 2006. I believe 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.

Examples of problems with the proposal are the following:

The definition of "temporary housing" would require thousands of small residential hobby and show breeding households to become licensed which could not possibly comply with 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 proposals pertaining to housing and social interaction of dogs of different sizes are contrary to good husbandry, socialization and training practices.

The proposal that outdoor facilities, including runs and exercise areas shall be kept free of grass is ludicrous. This proposal would in effect mean dogs could not be trained in grassy areas, dogs could not be used for hunting or field trials since they are run in grassy areas.

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 Dogs Clubs and The Harrisburg Kennel Club.

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. Clearly these proposal were the ideas of individuals with apparently a lack of common sense. I urge that this proposal be withdrawn.

Sincerely,

