

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 2:21

INDEPENDENT REGULATORY
REVIEW COMMISSION

January 27, 2007

Dear Ms. Bender,

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

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

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

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

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

I sincerely request that this proposal be withdrawn.

Yours Sincerely, *Jacob M. Zimmerman*

Dice Valley Kennel
771 Zimmerman Road
Mifflinburg, PA 17844

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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 2:44

INDEPENDENT REGULATORY
REVIEW COMMISSION

Jan 28, 2007

Dear Ms. Bender:

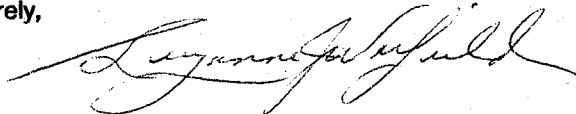
I am writing to comment on the proposed amendments to the Pennsylvania dog law regulations issued on December 16, 2006. I believe that inhumane and substandard kennel conditions should not be tolerated, but I do not agree that most of the proposed regulatory changes are needed, or would necessarily have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



Please keep in mind, Ms. Bender, that Toy Breeds cannot and must not be maintained like Sporting breeds or Giant Breeds or even compared with some — Please also know that this proposal is cumbersome and unenforceable on many levels
 (P.S. ... reconsider! Soon! Sincerely, Suzanne J. Field)

2559

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

2007 FEB -6 PM 2:43

INDEPENDENT REGULATORY
REVIEW COMMISSION January 28, 2007

Dear Ms. Bender:

My name is Donald Kraly and I reside at 164 Penns Woods Lane, Loysville, Pa. I am a member and Field Trial Secretary 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 the last thirty-six 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,

Donald R Kraly

2559

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

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INDEPENDENT REGULATORY
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- * 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.
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Sincerely,

Sherry Anderson
17701

no address

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 2:10

INDEPENDENT REGULATORY
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Sincerely,

Cecilia M. Kuge
18015

no address

2559

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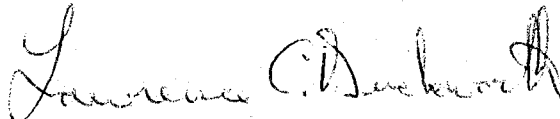
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Sincerely,



18013

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Sincerely,

Charlene M Piskula
18037

no address

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,

Doreen Miska
106 N. 8th
Croylax, Pa 18037

2559

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REVIEW COMMISSION

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Sincerely,

Cathy Lambert
4749 George ST
Pen Argyl PA 18072

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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INDEPENDENT REGULATORY
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Sincerely,

Susan Friebs
4356 Primrose Ct
Bethlehem PA 18020

2559

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Sincerely,

Irene West

236 Brookmead Rd.

Wayne, Pa 19087

2559

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Sincerely,

John Anger
3025 Berchtesgauer Weg
Coopersburg, Pa 18036

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207 FEB -6 PM 2:10

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Sincerely,

M R Savin
P.O. Box 53
GERMANSVILLE PA 18053

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 2:18

INDEPENDENT REGULATORY
REVIEW COMMISSION

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Sincerely,

Anne Thomson

ANNE THOMSON

2307 2nd. St.

EASTON, PA 18042

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,

Judi Monacelli
Forest Rd.
Poyntelle, PA

18454

2559

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

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Sincerely,

Brian Hef
6515 Riverwood Road
Staunton VA 18086

2559

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

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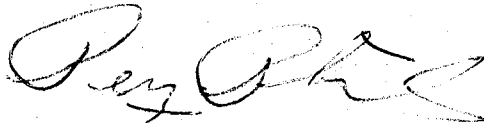
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Sincerely,



PO Box 5300
Springfield Pa 19064

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 2:18

INDEPENDENT REGULATORY
REVENUE COMMISSION

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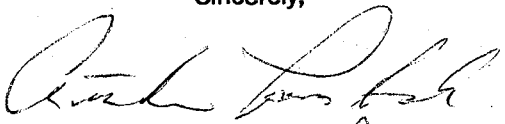
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Sincerely,


ARTHUR FORSTING

SAYLORSBURG, PA 18353

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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Jean M. Powstangle
JEAN M. POWSTANGLE
SAYLORSBURG PA 18353

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,

Ellen Madison
RR 2 Box 2155
Camden, PA
18325

2559

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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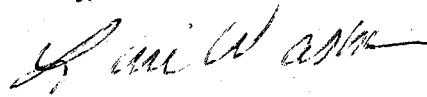
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420 BROAD ST
E HARRISBURG PA 17044

2559

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

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*Cheryl Washburn
Broad St.
E. Harrisburg, Pa 17149*

2559

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Sincerely,

Jamie Paracka
JAMIE PARACKA
128 SUNRISE LANE
POTTSTOWN PA 19464

2559

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Sincerely,

Betty K. ...
58 ...
Harrisburg, Pa 17101

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 2:18

INDEPENDENT REGULATORY
REVIEW COMMISSION

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Sincerely,

*Margaret Stauffert
32 Rabbit Run Rd
Palmer, Pa. 19355*

2559

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

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Sincerely,

Deane Kopushko
454 Auburn St.
Allentown PA 18103

2559

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

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Sincerely,

Carol Metzler
740 E. Moga St.
Allentown, Pa 18103

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,

Suzanne Nield
36 Carpenter Rd
Harveys Lake, Pa 18618

2559

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,

Susan James
Rt 4 Box 397
Hallow, Pa. 15612

2559

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

RECEIVED

7:07 FEB -6 PM 2:17

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Sincerely,

Ruth H. Brader

*1240 Nursery Rd.
Green Lane, Pa*

1 18054-9427

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,

DENICE VAN DUSEN
 4157 DICKSON RD
 OTTUMMA, PA 17942

2559

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

RECEIVED

237 FEB -6 PM 2:17

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Sincerely,

Cindy Horwath
707 Howertown Rd
Catasauqua PA 18032

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Pennsylvania Department of Agriculture
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Sincerely,

Margaret S. Bender
850 North Hill Dr
Allentown, PA 18103

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

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Sincerely,

Roberta J. Leuch
151 VILLAGE WALK DRIVE
MARCUSVILLE, PA 18062

2559

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

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Sincerely,

Stacie Ruchling
13380 Philmont Avenue
Somerton, PA 19116-1114
#215.677.0399

2559

RECEIVED

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

207 FEB -6 PM 2:17

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Sincerely,


251 Manor Rd
Harleysville, PA 19438

2559

RECEIVED

2007 FEB -6 PM 2:17

INDEPENDENT REGULATORY
REVIEW COMMISSION

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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MARY BENDER
HARRISBURG PA 17110-9408

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

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Sincerely,

Stephen Martyn
401 EAST ELM ST
CONSHOHOCKEN PA
19428

2559

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

2007 FEB -6 PM 2:17

INDEPENDENT REGULATORY
REVIEW COMMISSION

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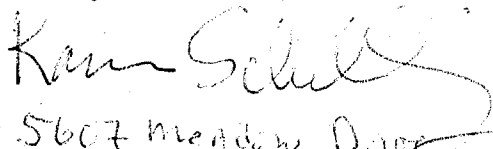
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Sincerely,


5607 Meadow Drive
Orzfield, PA 18069

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

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Sincerely,

Carol Baker
Clayliethtown, PA 17022

no
address

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Sincerely,

Linda Ebersole
Empire Township, PA 17022
no address

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Harrisburg, PA 17110-9408

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Sincerely,



410 N. Sherman St
Allentown, PA 1
17109

1-011-011117

2559

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

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Karen Stone

344 Graft Ave.

Elizabethtown, PA 17022

2559

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

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Margorie Kassin
1428 Walnut St.
Lansdale, Pa 19446.

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Sincerely,

Donna Etzel
373 Molasses Hill Rd
Berwyn, Pa 19506

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

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John Van Driescow
4157 Durham Road
Ottsville, Pa. 18942

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

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Sincerely,

Cheryl Butchko
81 E. Columbus Ave.
Pittston, PA 18640

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Sincerely,

Susan Sacco
1898 Blue Barn Rd
Orefield, PA
18069

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 2:17

INDEPENDENT REGULATORY
REVIEW COMMISSION

Dear Ms. Bender:

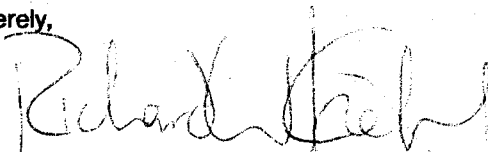
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Sincerely,



18020

no address

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Harrisburg, PA 17110-9408

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Anthony M. Trigiani
367 Pine Top Trail
Bethlehem PA 18017

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

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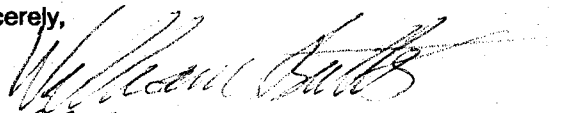
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Sincerely,


RR 3
Greentown PA 17436

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2301 North Cameron Street
Harrisburg, PA 17110-9408

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Roger R Koch
75 Coyote Drive
Jim Thorpe PA 18229

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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,

Lynise Keck
1328 Brantley Dr
Northampton Pa
15067

2559

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REVIEW COMMISSION

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Pennsylvania Department of Agriculture
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Dannie Wilson, CBC
PO Box 3500
Waymart PA 18472

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Pennsylvania Department of Agriculture
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Harrisburg, PA 17110-9408

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Sincerely,

Carole J. Lopez
2399 Dewey Ave
Northampton PA
18067

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

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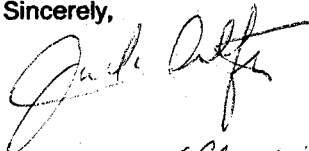
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Sincerely,



7969 Shamrock Rd.
New Berlin, PA. 18066

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Harrisburg, PA 17110-9408

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Shirley Hilgis
7969 Springhouse Rd.
New Tripoli, PA 18066

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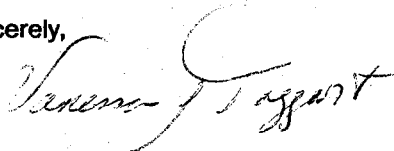
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VANESSA J. TAGGART
153 ROBERT ST
PO BOX 511
ALBERTUS PA 18011

2559

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Kellie J. Larkin
153 ROBERTS ST
PO BOX 511
ALBUQUERQUE PA 15011

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

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- * 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,



Nadine P. Pelleschi
 2717 ESTELLA Ave.
 Montoursville, PA
 17254¹

2559

RECEIVED

2007 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 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,

Stan M. Kutaloski
3211 Jacobus Rd
Coopersburg PA 18036

2559

RECEIVED

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

2007 FEB -6 PM 2:16

INDEPENDENT REGULATORY
REVIEW COMMISSION

Dear Ms. Bender:

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

- * The definition of "temporary housing" would require thousands of small residential hobby and show breeding households to become licensed which could not possibly comply with the regulations, and which there is no reason to regulate.
- * The obligations of owners of "temporary housing" which are made subject to inspection by the proposal are not enumerated or limited.
- * There is no scientific or accepted husbandry basis for the amended space and exercise requirements.
- * The regulations will require wholesale renovation, if not rebuilding, of many kennels already built in compliance with current federal and/or state standards. There is no scientific foundation for the arbitrary, rigid engineering standards specified.
- * Smaller breeders and dog owners who maintain their dogs in their own residential premises but are covered by the Pennsylvania dog law, who provide care and conditions far superior to those required by the proposed new standards, would be unable to comply with the rigid commercial kennel standards.
- * The record keeping requirements with respect to exercise, cleaning, and other aspects of kennel management are excessively burdensome and serve no useful purpose, as it would be impossible to verify their accuracy in all but the most egregious circumstances. Such egregious circumstances already violate existing regulations.
- * The proposals pertaining to housing and social interaction of dogs of different sizes are contrary to good husbandry, socialization and training practices.

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

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,

Stephen V. Kuntolaska
3211 JIMMY ROAD
COOPERSTOWN, PA 18036

January 28, 2007

2559

RECEIVED

2007 FEB -6 PM 2:43

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

INDEPENDENT REGULATORY
REVIEW COMMISSION

Re: Doc. No. 06-2452

Dear Ms. Bender:

My name is Lois Albright of 146 Manor Road, Centre Hall, PA. I purchased my first dog, a Keeshond, in 1980, and have trained and shown in Conformation, Obedience and Agility over the past 26 years. I am a member of the Mt. Nittany Dog Training Club, and participate in obedience training classes at our club site.


I purchased my dog directly from a reputable breeder, not from a pet shop, shelter, or rescue because I wanted to know that my dog would have a good temperament and be healthy. I wanted to know that my dog had been exposed to different situations and was prepared to live her life as a family pet and as a conformation and performance dog. By purchasing directly from a responsible breeder, I was able to see the conditions in which the dog was raised. My breeder raises her dogs in the house and works hard to provide the puppies with attention that builds confidence.

I credit my dog's good temperament to the love and attention my breeder gave her puppies, and to the breeder's knowledge of Keeshond pedigrees. Most importantly to me, this included constant exposure to everyday life noises, sights and sounds.

1. My puppy was taken outside to potty on grass regularly. This was important to me and helped my puppy with the housebreaking process.
2. My puppy was socialized with other dogs and is comfortable in our neighborhood setting, and at training classes and other dog performance events.
3. In a home situation my puppy was exposed to television, radio, dish washer, clothes washer, dryer, vacuum cleaner, and many other noises that occur regularly in my home.

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. I urge that this proposal be withdrawn.

Sincerely yours,



Lois Albright

2559

RECEIVED

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

2007 FEB -6 PM 2: 43

INDEPENDENT REGULATORY
REVIEW COMMISSION

Re. Doc. No. 06-2452

Dear Ms. Bender,

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

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

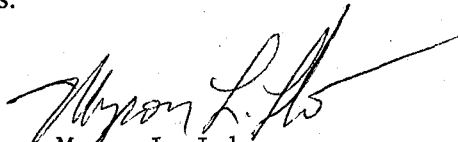
The proposed changes, particularly those applying to "Kennels- Primary Enclosures", are of particular concern to me. It is my understanding that in these proposed changes, if a cumulative total of 26 dogs are housed at "the Establishment" during a calendar year, then licensed breeders will be required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

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

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

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

Sincerely,


Myron L. Lebo
231 Ridgeview Drive
Marysville, PA 17053

2559

RECEIVED

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

2007 FEB -6 PM 2:43

INDEPENDENT REGULATORY
REVIEW COMMISSION

Re. Doc. No. 06-2452 Proposed Changes to the Dog Law

Dear Ms. Bender,

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

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

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

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

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

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

Sincerely,

*Wendy K...man
PO Box 426
WESLEYSET
NY 11767*

2559

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

RECEIVED

2007 FEB -6 PM 2:21

Re. Doc. No. 06-2452

INDEPENDENT REGULATORY
REVIEW COMMISSION

Dear Ms. Bender,

The breeder of my sheltie has brought to my attention the newly proposed dog law. As a person who cares very deeply about my beloved sheltie, I would like to express my concerns about these proposed changes.

I purchased my dog directly from a reputable breeder, not from a pet shop, shelter, or rescue because I wanted to know that my dog would have a good temperament and be healthy. Shelties have a reputation as being shy and noise sensitive. I wanted to know that my dog had been exposed to different situations and was prepared to live the life as a family pet. By purchasing directly from a breeder I was able to see the conditions the dog was raised in. My breeder raises her dogs in the house and works hard to provide the puppies with attention that builds confidence. I know this because my puppy was content from the day I brought him home and has been a valuable new member of the family.

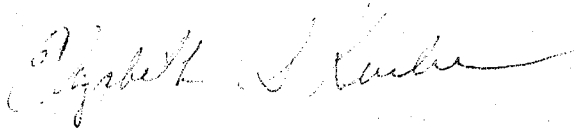
Upon reading your proposed changes I am primarily concerned about the "Kennels-Primary Enclosures" portion of this proposal. It is my understanding that in these proposed changes, if a cumulative total of 26 dogs are housed at "the Establishment" during a calendar year, then licensed breeders will have to build housing quarters to meet the specifications outlined in these proposed changes.

I credit my dog's good temperament to the love and attention my breeder gave her puppies. Most importantly to me, this included constant exposure to everyday life noises, sights and sounds.

1. My puppy was taken outside to potty on grass regularly. This was important to me and helped my puppy with the housebreaking process
2. My puppy was socialized with other dogs and is comfortable in our neighborhood setting where he sees, meets, and plays with other dogs of various breeds daily.
3. In a home situation my puppy was exposed to television, radio, dish washer, clothes washer, drier, coffee machines, and many many other noises that occur regularly in my home.

While I applaud the efforts to improve the living conditions for those poor dogs who live in puppy mills, I feel it would be a greater service to those dogs to not allow "for profit" breeding to occur in the first place.

Sincerely,



no address

2559

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

RECEIVED

207 FEB -6 PM 2:20

INDEPENDENT REGULATORY
REVIEW COMMISSION

Re. Doc. No. 06-2452

Dear Ms. Bender,

no address

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

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

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

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

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

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

Sincerely,

Carrie S. Schultz

2559

RECEIVED

2007 FEB -6 PM 2:46

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

INDEPENDENT REGULATORY
REVIEW COMMISSION

January 22, 2007

Dear Ms. Bender,

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

I appreciate that fact that the bureau has helped to improve the dog laws in the past several years. However, the current proposed regulation changes have appeared to be intentionally burdensome and go far beyond mere rulemaking. The proposals add completely new categories and definition. These changes must be addressed through the legislative process.

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

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

Yours sincerely,



Spring Brook Kennels
Rd 1 Box 354 State Rd
Shamokin, PA 17872

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 2:46

INDEPENDENT REGULATORY
REVIEW COMMISSION

January 24, 2007

Dear Ms. Bender,

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

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

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

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

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

Yours sincerely,

Christ K. Stoltzfus

Christ K. Stoltzfus
351 East Eby Road
Leola, PA 17540

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 2:45

INDEPENDENT REGULATORY
REVIEW COMMISSION

January 18, 2007

Dear Ms. Bender,

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

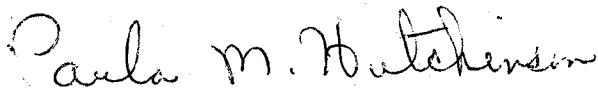
I appreciate that fact that the bureau has helped to improve the dog laws in the past several years. However, the current proposed regulation changes have appeared to be intentionally burdensome and go far beyond mere rulemaking.

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

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

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

Yours sincerely,



Paula M Hutchinson
329 Redwell Road
New Holland, PA 17557

2559

Miriam Fox Kennel
349 Dettlerline Dr.
New Enterprise, PA 16664

January 23, 2007

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

Dear Ms. Bender,

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

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

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

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

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

Yours truly,

Miriam Fox

RECEIVED

2007 FEB -6 PM 2:45

INDEPENDENT REGULATORY
REVIEW COMMISSION

2559

RECEIVED

2007 FEB -6 PM 2:45

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

INDEPENDENT REGULATORY
REVIEW COMMISSION

January 12, 2007

Dear Ms. Bender,

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

I appreciate that fact that the bureau has helped to improve the dog laws in the past several years. However, the current proposed regulation changes have appeared to be intentionally burdensome and go far beyond mere rulemaking. The proposals add completely new categories and definition. These changes must be addressed through the legislative process.

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

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

Yours sincerely,

Paul Hoover

Paul Hoover
246 Kurtz Road
Ephrata, PA 17522

2559

Catherine Mitchell
114 Redfield St
Tunkhannock, PA 18657

RECEIVED

2007 FEB -6 PM 2: 45

INDEPENDENT REGULATORY
REVIEW COMMISSION

January 23, 2007

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

Dear Ms. Bender,

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

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

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

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

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

Yours truly,

Catherine Mitchell

2559

RECEIVED

2007 FEB -6 PM 2: 43

INDEPENDENT REGULATORY
REVIEW COMMISSION

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

January 26, 2007

Dear Ms. Bender,

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

I appreciate that fact that the bureau has helped to improve the dog laws in the past several years. However, the current proposed regulation changes have appeared to be intentionally burdensome and go far beyond mere rulemaking. The proposals add completely new categories and definition. These changes must be addressed through the legislative process.

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

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

Yours sincerely,

Steven Stoltzfus
81 Leshar Rd
Newburg, PA 17240

2559

RECEIVED

2007 FEB -6 PM 2:43

INDEPENDENT REGULATORY
REVIEW COMMISSION

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

January 26, 2007

Dear Ms. Bender,

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

I appreciate that fact that the bureau has helped to improve the dog laws in the past several years. However, the current proposed regulation changes have appeared to be intentionally burdensome and go far beyond mere rulemaking. The proposals add completely new categories and definition. These changes must be addressed through the legislative process.

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

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

Yours sincerely,

Ben H. Stoltzfus

Ben Stoltzfus
333 Shaffertown Rd.
Madisonburg, PA 16852

Mullen's Kennels
RR 2 Box 1493
Three Springs, PA 17264

2559

RECEIVED

2007 FEB -6 PM 2:43

January 26, 2007

INDEPENDENT REGULATORY
REVIEW COMMISSION

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

Dear Ms. Bender,

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

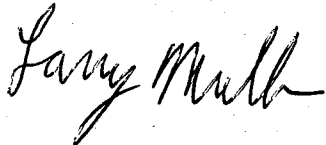
With a full understanding that the bureau is trying to improve substandard kennel conditions, I am not in agreement that most of the changes are necessary.

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

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

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

Yours truly,



Mountain Side Kennel
19526 Sweetwater Rd
Dry Run, PA 17220

2559

RECEIVED

2007 FEB -6 PM 2: 43

January 26, 2007

INDEPENDENT REGULATORY
REVIEW COMMISSION

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

Dear Ms. Bender,

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

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

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

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

Yours truly,

Joe L. Byler

Meadow View Kennel
3017 Irishtown Rd
Ronks, PA 17572

2559

RECEIVED

2007 FEB -6 PM 2:42

January 23, 2007

INDEPENDENT REGULATORY
REVIEW COMMISSION

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

Dear Ms. Bender,

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

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

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

Yours truly,



Daniel Newswanger
269 California Road
Morgantown, PA 19543

2559

RECEIVED

2007 FEB -6 PM 2:21

January 26, 2007

INDEPENDENT REGULATORY
REVIEW COMMISSION

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

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

Yours truly,

Daniel Newswanger

2559

Mary B. Nolt
236 Musser Rd
East Earl, PA 17519

RECEIVED

2007 FEB -6 PM 2:20

INDEPENDENT REGULATORY
REVIEW COMMISSION

January 30, 2007

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

Dear Ms. Bender,

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

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

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

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

Yours truly,

Mary B Nolt
Ronald Nolt

2559

RECEIVED

2007 FEB -6 PM 2:20

INDEPENDENT REGULATORY
REVIEW COMMISSION

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

January 22, 2007

Dear Ms. Bender,

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

I appreciate that fact that the bureau has helped to improve the dog laws in the past several years. However, the current proposed regulation changes have appeared to be intentionally burdensome and go far beyond mere rulemaking. The proposals add completely new categories and definition. These changes must be addressed through the legislative process.

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

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

Yours sincerely,

Ben Speicher

Speicher's Kennels
271 Summers Rd
Millersburg, PA 17061

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 2:46

INDEPENDENT REGULATORY
REVIEW COMMISSION

January 19, 2007

Dear Ms. Bender,

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

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

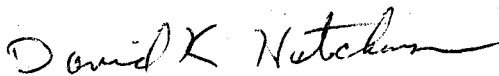
1. Unless the kennel has purchased, sold, or transferred more than 26 dogs in a calendar year to the individual, it is impossible for the kennel to know if the individual is required to have a Pennsylvania kennel license.
2. It is unlawful for the department to regulate and inspect kennels outside of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

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

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

I sincerely request that this proposal be withdrawn.

Yours Sincerely,



David Hutchinson
329 Redwell Road
New Holland, PA 17557

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 2:45

INDEPENDENT REGULATORY
REVIEW COMMISSION

January 27, 2007

Dear Ms. Bender,

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

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

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I sincerely request that this proposal be withdrawn.

Yours Sincerely,

Jonas + Anna Zerset

E Z Puppies
2223 Main St
Narvon, PA 17555

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 2:45

INDEPENDENT REGULATORY
REVIEW COMMISSION

January 26, 2007

Dear Ms. Bender,

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

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

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

I sincerely request that this proposal be withdrawn.

Yours Sincerely,



Deer Hollow Kennel
185 Truce Rd
New Providence, PA 17560

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 2:45
INDEPENDENT REGULATORY
REVIEW COMMISSION

January 19, 2007

Dear Ms. Bender,

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

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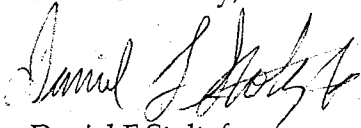
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The current proposal claims to be a general list of ideas to improve the breeding environment for dogs, which are neither substantiated by science nor attributed as accepted canine husbandry practices. A better idea would be for Pennsylvania to adopt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

I sincerely request that this proposal be withdrawn.

Yours Sincerely,



Daniel F Stoltzfus
255 School Lane Rd
Gap, PA 17527

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 2:21

INDEPENDENT REGULATORY
REVIEW COMMISSION

January 19, 2007

Dear Ms. Bender,

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

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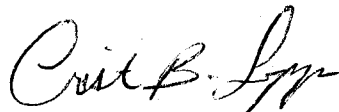
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The current proposal claims to be a general list of ideas to improve the breeding environment for dogs, which are neither substantiated by science nor attributed as accepted canine husbandry practices. A better idea would be for Pennsylvania to adopt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

I sincerely request that this proposal be withdrawn.

Yours Sincerely,



Christ B Lapp
3019 Irishtown Road
Ronks, PA 17572

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

RECEIVED

207 FEB -6 PM 2:21

INDEPENDENT REGULATORY
REVIEW COMMISSION

January 31, 2007

Dear Ms. Bender,

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

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

I sincerely request that this proposal be withdrawn.

Yours Sincerely,

Jacob M. Zimmerman

Dice Valley Kennel
771 Zimmerman Road
Mifflinburg, PA 17844