

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

RECEIVED

2007 FEB -6 AM 10:45

INDEPENDENT REGULATORY
REVIEW COMMISSION

January 26, 2007

Dear Chairman Coccodrilli,

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

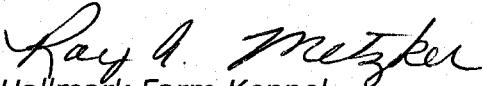
The proposed changes would require the kennel owner to record every time a water bowl or food pan is washed, every time the primary and secondary pen enclosures are cleaned, the feeding and watering dates and times, etc. These excessive and burdensome requirements will require a substantial increase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

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

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

I sincerely urge that this proposal be rescinded.

Yours Sincerely,


Hallmark Farm Kennel
1516 Ewing Rd
Punxsutawney, PA 15767

2559

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

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January 31, 2007

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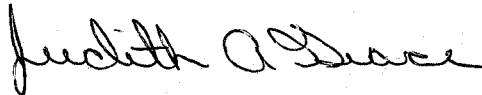
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Yours Sincerely,



Howliday Inn
1563 Piedmont Rd
Somerset, PA 15501

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333 Market Street, 14th Floor
Harrisburg, PA 17101

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2007 FEB -6 AM 10:45

INDEPENDENT REGULATORY
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January 20, 2007

Dear Chairman Coccodrilli,

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I sincerely urge that this proposal be rescinded.

Yours Sincerely,



Lloyd E. Gerhart
139 W. King Street
Ephrata, PA 17522

2559

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

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INDEPENDENT REGULATORY
REVIEW COMMISSION

January 31, 2007

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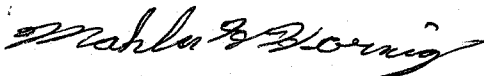
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I sincerely urge that this proposal be rescinded.

Yours Sincerely,



Mahlon H. Horning
2140 Mensch Rd.
Mifflinburg, PA 17844

2559

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IRRC

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

2007 FEB -6 AM 10:43

INDEPENDENT REGULATORY
REVIEW COMMISSION

January 31, 2007

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

Dear Mr. Jewett,

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2140 Mensch Rd.
Mifflinburg, PA 17844

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Phares Horning !

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2140 Mensch Rd
Mifflinburg, PA 17844

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I sincerely urge that this proposal be rescinded.

Yours Sincerely,



Horton's Boarding Kennel
940 Schoeneck Rd
Ephrata, PA 17522

2559

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

RECEIVED

2007 FEB -8 AM 11:18

INDEPENDENT REGULATORY
REVIEW COMMISSION

January 30, 2007

Dear Chairman Coccodrilli,

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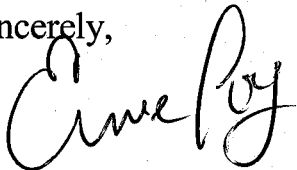
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The Departments direction and intentions are neither attributed as accepted canine husbandry practices nor substantiated by science. The Department should base their changes on education to improve the industry. I request that this proposal be withdrawn.

Yours sincerely,



Sun Mei Kennels
4175 Wood Dr
Walnutport, PA 18088

2559

IRRC

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

RECEIVED

2007 FEB -8 AM 11:19

INDEPENDENT REGULATORY
REVIEW COMMISSION

January 30, 2007

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Yours sincerely,

 Pres.

TLC Kennel Inc.
338 Sunnyburn Rd
Elizabethtown, PA 17022

2559

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

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2007 FEB -8 AM 11: 21

INDEPENDENT REGULATORY
REVIEW COMMISSION

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Yours sincerely,



The Meadows Pet Resort Kennel
805 Copenhaffer Rd
York, PA 17404

2559

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333 Market Street, 14th Floor
Harrisburg, PA 17101

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INDEPENDENT REGULATORY
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Yours sincerely,



The Dog House
2188 Stevenson Hill Rd.
Reynoldsville, PA 15851

2559

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

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INDEPENDENT REGULATORY
REVIEW COMMISSION

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Yours sincerely,



Naomi Stoltzfus
5381 Amish Road
Gap, PA 17527

2559

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

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2007 FEB -6 AM 10:44

INDEPENDENT REGULATORY
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Yours sincerely, 

Union Canal Kennel
1705 Russell Rd
Lebanon, PA 17046

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

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2007 FEB -8 AM 11: 22

INDEPENDENT REGULATORY
REVIEW COMMISSION

January 30, 2007

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Yours sincerely,



TJ's Kennel
271 Winter Park Rd
Grampian, PA 16838

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

RECEIVED
2007 FEB -8 AM 11:22
INDEPENDENT REGULATORY
REVIEW COMMISSION

January 24, 2007

Dear Chairman Coccodrilli,

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Yours sincerely,



State College Veterinary Hospital Kennel
1700 W. College Ave.
State College, PA 16801

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333 Market Street, 14th Floor
Harrisburg, PA 17101

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Yours sincerely,



The Hush Puppy Kennel
RR 2 Box 181 West
Thompsontown, PA 17094

2559

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Harrisburg, PA 17101

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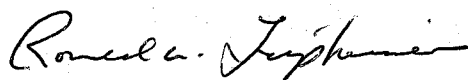
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Yours sincerely,



Swamp Run Kennel
20 Basham Lane
Grove City, PA 16127

2559

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Yours sincerely,

Paulene Jook owner

Tuscarora Kennel's
RR 1 Box 22
East Waterford, PA 17021

2559

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Attn: Arthur Coccodrilli, Chairman
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January 22, 2007

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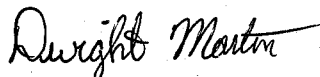
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Yours sincerely,



Southside Kennel
758 Ranck Rd
New Holland, PA 17557

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14th Floor Harristown 2
333 Market St.
Harrisburg, PA 17101

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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, *Edna M. Brubaker*

Strawberry Lane Kennel
40 Lenge Road
Myerstown, PA 17067

2559

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

RECEIVED

2007 FEB -6 AM 10:46

INDEPENDENT REGULATORY
REVIEW COMMISSION

January 31, 2007

Dear Chairman Coccodrilli,

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

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

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

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

Yours sincerely,

Meresa M. Kaschak
David J. Kaschak

T & D Kennels
3660 Brown Rd
Waterford, PA 16441

2559

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

RECEIVED

2007 FEB -6 AM 10:46

INDEPENDENT REGULATORY
REVIEW COMMISSION

January 30, 2007

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

Yours sincerely,



Sunvalley Kennel
1277 Latrobe Crabtree Rd
Latrobe, PA 15650

2559

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

RECEIVED

2007 FEB -6 AM 10:45

INDEPENDENT REGULATORY
REVIEW COMMISSION

January 30, 2007

Dear Chairman Coccodrilli,

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

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

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

Yours sincerely,

Gary Aust

2-2-07

570-673-2720

Triple CCC Kennel
3964 River Rd
Troy, PA 16947

2559

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

RECEIVED

2007 FEB -6 AM 10:45

INDEPENDENT REGULATORY
REVIEW COMMISSION

January 31, 2007

Dear Chairman Coccodrilli,

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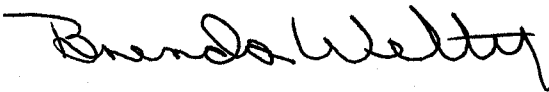
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The Departments direction and intentions are neither attributed as accepted canine husbandry practices nor substantiated by science. The Department should base their changes on education to improve the industry. I request that this proposal be withdrawn.

Yours sincerely,



The Dog Gone Barn Kennels
104 Lazy West Ln.
Cheswick, PA 15024

2559

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

RECEIVED

2007 FEB -6 AM 10:45

INDEPENDENT REGULATORY
REVIEW COMMISSION

January 30, 2007

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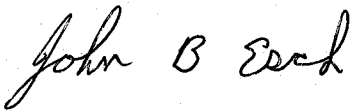
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The Departments direction and intentions are neither attributed as accepted canine husbandry practices nor substantiated by science. The Department should base their changes on education to improve the industry. I request that this proposal be withdrawn.

Yours sincerely,



Stoney Brook Kennel
151 Lapp Farm Dr
Coatesville, PA 19320

2559

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

RECEIVED

2007 FEB -6 AM 10:45

INDEPENDENT REGULATORY
REVIEW COMMISSION

January 31, 2007

Dear Chairman Coccodrilli,

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


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

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

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

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

Yours sincerely,


Deborah Schuchman, Owner

The Pet Shop Inc
170 Montgomery Mall
North Wales, PA 19454

2559

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

RECEIVED

2007 FEB -6 AM 10:45

INDEPENDENT REGULATORY
REVIEW COMMISSION

January 30, 2007

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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.

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

Yours sincerely,



Trillium Kennels
161 Yeany Lane
Mayport, PA 16240

2559

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

RECEIVED

2007 FEB -6 AM 10:44

INDEPENDENT REGULATORY
REVIEW COMMISSION

January 31, 2007

Dear Chairman Coccodrilli,

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

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

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

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

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

Yours sincerely,

David D. Mast

The Mast's Kennel
141 Marshall Rd
Luthersburg, PA 15848

2559

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

RECEIVED

2007 FEB -6 AM 10:45

INDEPENDENT REGULATORY
REVIEW COMMISSION

January 31, 2007

Dear Chairman Coccodrilli,

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

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

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

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

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

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

Yours sincerely,



Allen B. Zimmerman
343 Reidenbach Road
New Holland, PA 17557

2559

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

RECEIVED

2007 FEB -6 AM 10:44

INDEPENDENT REGULATORY
REVIEW COMMISSION

February 1, 2007

Dear Chairman Coccodrilli,

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

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

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

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

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

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

Yours sincerely, *John Z Zook*

John Z. Zook
313 Cabin Drive
Ephrata, PA 17522-8622

Georgia Smith

603 Jennifer Lane, Gilbertsville, Pennsylvania 19525

February 6, 2007

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

February 2, 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. 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:

1. The penalties in § 21.4(1)(iii) for "failure of an individual to comply with licensure provisions" should be increased from \$25 to \$300 per violation to \$25 to \$300 *per day of violation*.
2. The Secretary should be mandating to file suit to enjoin operation of unlicensed kennels where the kennel is not in compliance with the standards in the regulations and is unable to qualify for a license.
3. I commend the Department of Agriculture and the Bureau of Dog Law Enforcement for doubling the required cage size. This is perhaps the most important change that can be made to improve the quality of life for dogs in commercial breeding facilities in Pennsylvania. This

provision should remain in the regulations regardless of opposition from breeders. This section should be further strengthened by adding a provision stating that where more than one dog is housed in a primary enclosure, the primary enclosure must provide adequate space for all dogs. For instance, if the enclosure houses two dogs, it must provide double the cage space that would be required for a single dog. If it houses three dogs, it must provide three times the cage space, etc.

4. I also commend the Department of Agriculture and Bureau of Dog Law Enforcement for including a provision that requires the dog wardens to visually observe the physical condition of each dog. However, the provisions regarding orders of veterinary care should be strengthened to state that the owner must provide "proof of *current and proper* veterinary care for the dog." This provision should also be amended to include excessive matting and excessively long toenails as indications of lack of proper veterinary care. Inadequate grooming can lead to painful medical issues for dogs, including skin lesions from excessive matting and leg and joint injuries from failure to keep toenails appropriately trimmed. Moreover, the section should be amended to *require* dog wardens to order a veterinary check on dogs that exhibit signs of infection, contagious disease or parasite; or that appear to be in poor health where proof of current and proper veterinary care is not provided.

5. A new subsection should be added to § 21.30 clarifying the required training for dog wardens. Training in the following areas should be added into the regulations to expand upon the requirements set forth in 3 P.S. § 459-901:

1. State laws relating to dog licensing, control and owner responsibilities;
2. State and federal laws relating to animal care, cruelty and neglect;
3. State laws relating to dangerous dogs;
4. State and federal law relating to lack of arrest powers, proper use of search, seizure and warrants;
5. State and federal laws relating to pounds and shelters;
6. Basics of cruelty and neglect investigations for referral to appropriate authorities;
7. Report-writing and record-keeping;
8. Overview of the legal system, court structure and terminology;
9. Basics of interpreting animal behavior;
10. Identification of injury, disease, abuse and neglect in dogs;
11. Animal hoarders; and
12. Civil liability issues.

6. A new section should be added to the regulations mandating that the Department and dog wardens coordinate and work with law enforcement when applicable. It is imperative that the department work with law enforcement, and specifically Humane Society police officers, to ensure that both the cruelty laws and the Dog Law are adequately enforced.

7. A new section should be added to the regulations requiring that a licensee must have enough employees to carry out the level of husbandry practices and care required by the Act and its regulations. Additionally, the employees who provide for care and husbandry or handle animals should be supervised by an individual who has the knowledge, background, and experience in proper husbandry and care of dogs to supervise others. The licensee must be certain that the supervisor and other employees can perform to such standards.

8. Stacking primary enclosures on top of one another should be prohibited. Stacking cages creates an unnatural environment for the dogs. Additionally, it makes observation of the dogs more difficult and creates sanitation problems. Even with a tray or partition between cages, it is likely that the partitions may overflow, causing feces, urine, food, water, and hair to fall onto the dogs located in the cages below.

9. The section on wire mesh flooring should be amended to make it at least as strict as the federal Animal Welfare Act, which requires that metal strand flooring be greater than one-eighth of an inch in diameter (9 gauge) or coated with a material such as plastic or fiberglass. Language should also be added requiring that all primary enclosures that have wire mesh flooring also have a resting board of sufficient size to allow each dog in the enclosure to lie in a full lateral recumbent position and be able to make normal postural adjustments. Resting boards are necessary to provide for the comfort of the dog and to allow the animal to have some time away from living on grated fencing. Providing resting boards will result in fewer foot lesions and other foot and leg injuries to the dogs. A solid resting surface that is impervious to moisture is also a more natural environment for the animal, provides a draft-free surface and enables the dog to retain its body heat. A dog feels most vulnerable when lying down, and forcing a dog to lie over an exposed area can contribute to anxiety. Humane standards and survival standards are separate, and creating an environment that merely allows for survival does not necessarily make such an environment humane.

10. Contrary to what the breeding industry states, the engineering standards specified in the proposed regulations do have a scientific foundation. The standards in the proposed regulations are more akin to acceptable husbandry practices. They will bring the engineering standards up to par with, if not above, those set forth in the Animal Welfare Act. Contrary to the hobby breeders' contention, the new regulations will not bring hobby breeders under the purview of the Dog Law. Only kennels that keep, harbor, board, shelter, sell, give away, or transfer a cumulative total of 26 or more dogs in one calendar year will be required to comply with the new regulations. As a result, true hobby breeders are still exempt from the law. Good husbandry practices dictate that anyone harboring a larger number of dogs (26 or more) should comply with certain engineering standards to ensure the health, safety, and well-being of the dogs. The Dog Law and its regulations are aimed at regulating larger and commercial breeding facilities. Therefore, the new regulations will not affect hobby breeders, contrary to what the breeding community suggests.

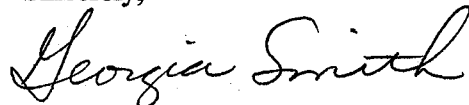
Once again, I commend the Department of Agriculture and the Bureau of Dog Law Enforcement for proposing regulations that will improve the conditions for dogs housed and bred in Pennsylvania's commercial kennels. The changes I have noted above will further ensure that such dogs are protected.

Thank you for your time and consideration of the above, but I have to say that the above conditions are the very LEAST we should be doing for the dogs. I feel we need to do much more for their well being. I am very sure they feel sadness every day they are alive and I feel the sadness myself.

Please do all you can do

Thank you.

Sincerely,

A handwritten signature in cursive script that reads "Georgia Smith". The signature is written in black ink and is positioned to the right of the word "Sincerely,".

Georgia Smith
603 Jennifer Lane
Gilbertsville, PA 19525

2559

Reuben Brenneman
706 Davis Rd
Salisbury, PA 15558

RECEIVED

January 31, 2007

2007 FEB -6 AM 10:44

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

INDEPENDENT REGULATORY
REVIEW COMMISSION

Dear Chairman Coccodrilli,

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

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

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,

Reuben E Brenneman

2559

**Krazy A Shop
11433 Rt 120
Emporium, PA 15834**

RECEIVED

2007 FEB -6 AM 10:46

INDEPENDENT REGULATORY
REVIEW COMMISSION

January 26, 2007

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

Dear Chairman Coccodrilli,

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

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

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

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

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

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

Yours Sincerely,

Betty D Allen owner/operator

2559

Emanuel Byler
18424 Dry Run Rd West
Spring Run, PA 17262

RECEIVED

2007 FEB -6 AM 10:43

January 30, 2007

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

INDEPENDENT REGULATORY
REVIEW COMMISSION

Dear Chairman Coccodrilli,

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

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

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

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

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

Sincerely,

Emanuel Byler

2559

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

RECEIVED

2007 FEB -6 AM 10: 43

INDEPENDENT REGULATORY
REVIEW COMMISSION

January 31, 2007

Dear Chairman Coccodrilli,

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

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

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

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

I sincerely urge that this proposal be rescinded.

Yours Sincerely,

Louise Horning

Louise Horning
2140 Mensch Rd
Mifflinburg, PA 17844

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

RECEIVED

2559

2007 FEB -6 AM 10: 43

January 31, 2007

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,

Sharon A. Bassett

Sharon's Boarding Kennel

Rd 1 Box 296
Sunbury, PA 17801

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

RECEIVED
2007 FEB -6 AM 10:43
INDEPENDENT REGULATORY
REVIEW COMMISSION

February 1, 2007

Dear Chairman Coccodrilli,

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

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

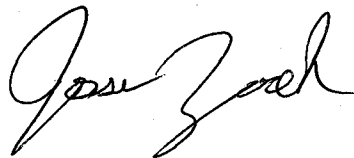
The proposals referencing housing and social interaction of dogs of different sizes are contrary to good husbandry, socializing and training practices. Furthermore, there is no scientific or accepted husbandry basis for the amended space and exercise requirements.

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

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

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

Yours sincerely,



Jesse Zook
RD #2 Box 22
East Waterford, PA 17021

2559

RECEIVED

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

2007 FEB -6 AM 10:43

INDEPENDENT REGULATORY
REVIEW COMMISSION

February 1, 2007

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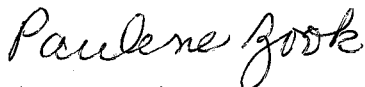
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The current proposed appears to be over idealistic in term of improving the welfare of dogs. I urge that this proposal be rescinded and an approach similar to the USDA standards be developed.

Yours sincerely,



Paulene Zook
RD #1, Box 22
East Waterford, PA 17021

2559

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

RECEIVED

2007 FEB -6 AM 10: 43

INDEPENDENT REGULATORY
REVIEW COMMISSION

January 31, 2007

Dear Chairman Coccodrilli,

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

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

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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, *Paul H. Zimmerman*

Paul H. Zimmerman
1751 Mill Rd
East Earl, PA 17519-9555

2559

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

RECEIVED

2007 FEB -6 AM 10:43

INDEPENDENT REGULATORY
REVIEW COMMISSION

January 31, 2007

Dear Chairman Coccodrilli,

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

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

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

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

I sincerely urge that this proposal be rescinded.

Yours Sincerely,



Catherine Hostetler
6922 E. Back Mountain Rd
Reedsville, PA 17084

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

RECEIVED

2007 FEB -6 AM 10:43

INDEPENDENT REGULATORY
REVIEW COMMISSION

February 1, 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, *Roselyn Zook*

Roselyn Zook
RD #1, Box 22
East Waterford, PA 17021

2559

Linda Martin
1526 Milton Grove Rd
Mount Joy, PA 17552

RECEIVED

2007 FEB -6 AM 10:43

INDEPENDENT REGULATORY
REVIEW COMMISSION

January 30, 2007

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

Dear Chairman Coccodrilli,

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

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

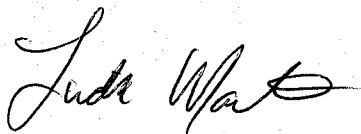
The bureau already requires the name, address, acquisition date, disposition date, type of sale, breed, sex, color, whelping date, and identification number be recorded for each and every dog sold, transferred, adopted, or given away. If the department wishes to enforce the law, they already have all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

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

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

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

Yours Sincerely,



2559

Louie Kanagy
330 West Back Mountain Rd
Belleville, PA 17004

RECEIVED
2007 FEB -6 AM 10:43

INDEPENDENT REGULATORY
REVIEW COMMISSION

January 20, 2007

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

Dear Chairman Coccodrilli,

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

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

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

Yours Sincerely,

Louie D. Kanagy

2559

Allison Gap Kennel
330 W. Back Mountain Rd
Belleville, PA 17004

RECEIVED

2007 FEB -6 AM 10:44

INDEPENDENT REGULATORY
REVIEW COMMISSION

January 20, 2007

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

Dear Chairman Coccodrilli,

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

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

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

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

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

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

Sincerely,

Allison GAP KENNEL

2559

RECEIVED

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

2007 FEB -6 AM 10:44

January 27, 2007
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.

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

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

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

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

Yours sincerely,

Elvin Martin

Wind Chime Kennels
76 Chaapel Rd
Milton, PA 17847

2559

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

RECEIVED

2007 FEB -6 AM 10:44

INDEPENDENT REGULATORY
REVIEW COMMISSION

February 2, 2007

Dear Chairman Coccodrilli,

I am writing to comment on the proposed amendments to the Dog Law Regulations Act 225 issued on December 16, 2006.

I personally think that many of the changes are impractical and burdensome, and will not improve the quality of life for dogs in kennels.

The proposed regulations will require a substantial increase in manpower with many house 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. 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 terms 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,



Si Si Chihuahuas
1105 Bowers Bridge Road
Manchester, Pa 17345

2559

IVAN SENSENIG
245 SPRING GROVE ROAD
EAST EARL, PA 17519

RECEIVED
2007 FEB -6 AM 10: 44

INDEPENDENT REGULATORY
REVIEW COMMISSION

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

January 19, 2007

Dear Chairman Coccodrilli,

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

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

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

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

Yours Sincerely,

Ivan Sensenig

2559

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

RECEIVED

2007 FEB -6 AM 10:44

INDEPENDENT REGULATORY
REVIEW COMMISSION

January 19, 2007

Dear Chairman Coccodrilli,

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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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I sincerely urge that this proposal be rescinded.

Yours Sincerely,



**Emma Brubaker
506 School Road
Denver, PA 17517**

2559

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

RECEIVED

2007 FEB -6 AM 10:44

INDEPENDENT REGULATORY
REVIEW COMMISSION

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I sincerely urge that this proposal be rescinded.

Yours Sincerely,

Elmer Z. Zook

Elmer Z. Zook
315 Cabin Drive
Ephrata, PA 17522

2559

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

January 27, 2007

Dear Chairman Coccodrilli,

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

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

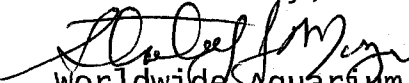
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The current proposed appears to be over idealistic in term of improving the welfare of dogs. I urge that this proposal be rescinded and an approach similar to the USDA standards be developed.

Yours sincerely,


Worldwide Aquarium & Pets
6801 Frankford Avenue
Philadelphia, PA 19135

INDEPENDENT REGULATORY
REVIEW COMMISSION

2007 FEB -6 AM 10:44

RECEIVED

2559

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

RECEIVED

2007 FEB -6 AM 10:45

INDEPENDENT REGULATORY
REVIEW COMMISSION

January 31, 2007

Dear Chairman Coccodrilli,

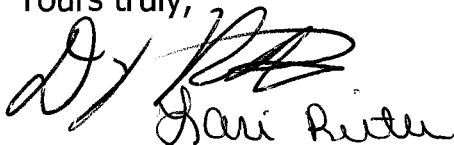
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The proposed regulations will require a substantial increase in manpower with many hours dedicated to filling out bureaucratic reports or recordkeeping which the department already has.

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,



Reiter's Copper Creek Kennel
1170 Barr Slope Rd
Clymer, PA 15728

2559



Mr Steven B King
274 W Center Square Rd
Leola, PA 17340-9726

RECEIVED

2007 FEB -6 AM 10:45

INDEPENDENT REGULATORY
REVIEW COMMISSION

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

January 23, 2007

Dear Chairman Coccodrilli,

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

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

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

Yours Sincerely,

Steven B King

2559

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

January 27, 2007

Dear Chairman Coccodrilli,

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Yours sincerely,

Michael C. Wark

Working Dog Inc.
RR 7 Box 7297
Saylorsburg, PA 18353

INDEPENDENT REGULATORY
REVIEW COMMISSION

2007 FEB -6 AM 10:45

RECEIVED

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

RECEIVED

2007 FEB -6 AM 10:45

INDEPENDENT REGULATORY
REVIEW COMMISSION

January 23, 2007

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RECORDS

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.

21.15 EXEMPTIONS

I sincerely urge that this proposal be rescinded.

Yours Sincerely, *John M. Horning*

Green Meadows Kennel
 78 Centennial Rd
 Mifflinburg, PA 17844

2559

Nezka Pfeifer
Summit by the Lake
303 Lakewood Manor
Scranton, PA 18505
nezka@juno.com

RECEIVED

2007 FEB -6 AM 10:42

INDEPENDENT REGULATORY
REVIEW COMMISSION

February 5, 2007

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

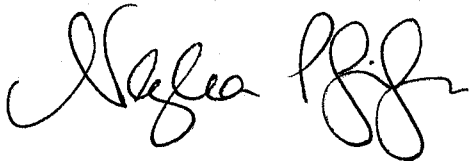
Dear Ms Bender:

I am writing to support the legislative changes to the commercial kennel regulations in Pennsylvania. As a new resident to Pennsylvania, I am dismayed to know that this is "puppy mill capital of the East," especially since, for years, Pennsylvania residents have called upon their legislators and regulators to clean up the cruel puppy mills that brutalize dogs and tarnish the state's image.

The changes suggested last December will improve the outdated kennel regulations used to inspect commercial breeding operations in Pennsylvania. And as a PA resident, I would like my voice to be heard in support of better treatment for dogs in puppy mills. If the proposed regulations are approved, dogs in Pennsylvania puppy mills will be provided with more space, will have better protection from the elements and will have time outside of their cages for exercise.

Thank you very much for your time and consideration, and hope that these changes will be made for the future of all canines in Pennsylvania.

Sincerely,



Nezka Pfeifer

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

80 Green forest Lane

2559

RECEIVED

Lehighton Pa. 18235

2007 FEB -6 AM 10: 42

February 2, 2007

INDEPENDENT REGULATORY
REVIEW COMMISSION

To whom it may concern

I am writing on behalf of all the poor animals in the Puppy Mills in Pennsylvania. It has gotten to the point that I am ashamed to say I am from Pennsylvania.

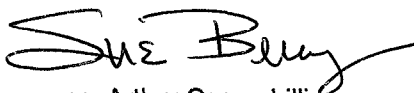
I strongly approve and support the following changes that should be made. I would prefer that they be shut down but in the meantime these new provisions will help

- » doubling the minimum cage size
- » requiring daily exercise outside of the cage
- » required heat when the temperature drops below 50 degrees
- » required cooling (by fan or air conditioning) when the temperature rises above 85 degrees
- » improving ventilation in kennel areas
- » denying kennel licenses to individuals convicted of animal cruelty within the past 10 years.

I am also requesting an exemption for shelters from the kennel expansion and exercise requirements I also request that foster homes should be exempt from kennel housing requirements and instead have separate performance standards appropriate for home care settings

Sincerely,

Sue Beveridge



cc: Arthur Coccodrilli

KAREN L. VASICAK

265 Watkins Street
Swoyersville, PA 18704

E-Mail: beeczican@msn.com

Telephone: (570) 331-4081

2559

February 2, 2007

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

Dear Chairman Coccodrilli:

I am a Pennsylvania Resident and I am writing to you today with regard to Governor Ed Rendell's commitment to help the tens of thousands of dogs affected by Pennsylvania puppy mills. As you know, the issue has been getting a lot of attention and I fully support the changes set forth in the PROPOSED RULEMAKING, DEPARTMENT OF AGRICULTURE, [7 PA. CODE CHS. 21, 23, 25 AND 27], Dog Law Enforcement, [36 Pa.B. 7596] [Saturday, December 16, 2006], not limited to, but including, the following requirements:

- (a) doubling the minimum cage size;
- (b) requiring daily exercise outside of the cage;
- (c) required heat when the temperature drops below 50 degrees;
- (d) required cooling (by fan or air conditioning) when the temperature rises above 85 degrees;
- (e) improving ventilation in kennel areas; and
- (f) denying kennel licenses to individuals convicted of animal cruelty within the past 10 years.

The proposed changes could improve the living conditions of dogs who currently suffer in puppy mills. I fully support the new, more humane regulations.

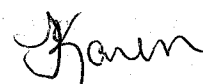
There has been some concern that animal shelters and rescue groups may be affected by the kennel regulations due to the addition of a new definition of "temporary home." Please provide an exemption for shelters from the kennel expansion and exercise requirements. I also believe that foster homes should be exempt from kennel housing requirements and instead have separate performance standards appropriate for home care settings.

Please help these animals who can not help themselves!

THANK YOU!

Sincerely yours,

KAREN L. VASICAK



RECEIVED
2007 FEB - 6 AM 10:22
INDEPENDENT REGULATORY
REVIEW COMMISSION

2559

Arthur Coccodrilli, Chairman
Independent Reg. Review Commission

RECEIVED

2007 FEB -6 AM 10: 42

INDEPENDENT REGULATORY
REVIEW COMMISSION

Dear HUMAN:

Please help this law pass! These are deplorable, inhumane, disgusting, and HORRIFIC conditions that these poor innocent dogs live it. Cramp, extreme HOT/COLD temperatures, diseases that aren't treated, no human contact, small confining cages that don't even allow them to stand up never mind walk and get exercise!! This is a HORRIBLE and excruciating existence. Have a heart, even though most of you in Congress, the Senate and Gov't tend NOT to have one...Surprise us and give these animals a HUMANE existence!

Please change these regulations! The SOONER THE BETTER for these poor and innocent victims of severe abuse!

- » doubling the minimum cage size
- » requiring daily exercise outside of the cage
- » required heat when the temperature drops below 50 degrees
- » required cooling (by fan or air conditioning) when the temperature rises above 85 degrees
- » improving ventilation in kennel areas
- » denying kennel licenses to individuals convicted of animal cruelty within the past 10 years

Sincerely,

Someone who cares for the animals that cannot speak for themselves.


Allison Griffin

PO Box 31

South Gibson, PA 18842

2559

RECEIVED

2007 FEB -6 AM 10:42

INDEPENDENT REGULATORY
REVIEW COMMISSION

Vincent Strangio
4013 Sardis Road
Murrysville, PA 15668
412-580-8334

February 3, 2007

Arthur Coccodrilli, Chairman
Independent Regulatory Review Commission
333 Market Street, 14th Floor
Harrisburg, PA 17110

Dear Mr. Coccodrilli,

I am writing you today regarding the proposed changes to the dog kennel regulations in Pennsylvania and beg you to support them. It is just disgusting to see how some of these animals are kept and cared for and an absolute disgrace to Pennsylvania. Pennsylvania is widely known as the Puppy Mill capital and that just makes me so mad. How can we possibly accept this and let it continue?

The proposed changes make so much sense and will improve the lives of countless innocent animals. The only people who would object to these changes are the immoral owners of these operations who profit from the misery of animals. The vast majority of Pennsylvanians would support them and also be outraged at the current conditions and regulations.

I am asking you to please be sure to support the proposed changes and include a special exemption for animal shelters and foster homes so animal rescue groups are not inadvertently hurt. Thank you for your time.

Sincerely,

Vincent Strangio

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:

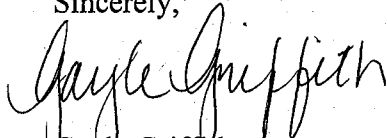
I am writing to you in reference to the new legislation being proposed by lawmakers in Pennsylvania in an effort to improve the living conditions of animals that live in commercial breeding facilities.

I 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.

I thank you for your efforts on behalf of the helpless animals that are suffering in the state of Pennsylvania and I hope that you will work for this legislation to be passed and become law. The Bureau has my whole-hearted support to implement the new regulations and to continue policing and shutting down the substandard kennels that have littered our state to such a degree that we're known as the 'Puppy Mill Capital' of the east.

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.

Sincerely,


Gayle Griffith

Jonathan D. Schroeder
3 York Road
Wilmington, DE 19803

(302) 654-6787

February 5, 2007

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

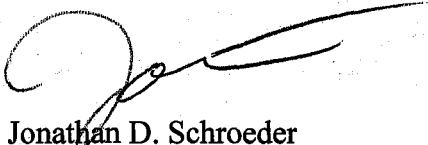
Dear Ms. Bender:

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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.

Sincerely,



Jonathan D. Schroeder

February 5, 2007

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

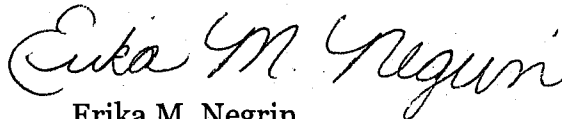
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Once again, I applaud your efforts on behalf of the helpless animals that are suffering in the state of PA at this very moment due to the greed of certain individuals. I hope that you will work tirelessly to see to it that this legislation can be passed 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,



Erika M. Negrin
RR1 Box 1155
Henryville, PA 18332
(570) 595-8559

Kathleen E. Schroeder
3 York Road
Wilmington, DE 19803

(302) 654-6787

February 5, 2007

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

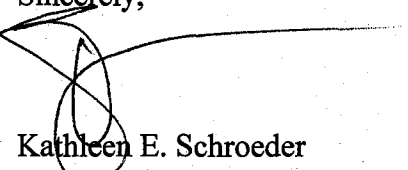
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Sincerely,



Kathleen E. Schroeder

William R. Small
P.O. Box 95
Kennett Square, PA 19348

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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Sincerely,


William R. Small

February 5, 2007

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

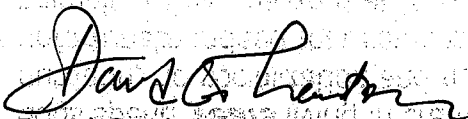
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Most sincerely,



David G. Thornton
60 Lower Orchard Drive
Levittown, PA 19056-2724

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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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,



Sandra L. Thornton
60 Lower Orchard Drive
Levittown, PA 19056-2724

Susan Mulhern
36 Hart Avenue
Hopewell, NJ 08525

February 5, 2007

Ms. Mary Bender

Department of Agriculture

Bureau of Dog Law Enforcement

2301 North Cameron Street

Harrisburg, PA 17110-9408

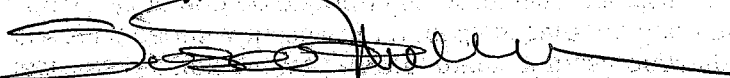
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Once again, I applaud your efforts on behalf of the helpless animals that are suffering in the state of PA at this very moment due to the greed of certain individuals. I hope that you will work tirelessly to see to it that this legislation can be passed 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,



Susan Mulhern

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.

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Most sincerely,



Susan Ladenheim
16 Oak Dr.
Plainview, NY 11803

LAURA SCHNEIDER

77 Wallace Street #1
Red Bank, NJ 07701-1810

C: (732) 687-7284
colorado66@hotmail.com

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

February 4, 2007

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 rescuers who are already working tirelessly on behalf of animals. That being said, I would like to once again express my support of this legislation.

Sincerely,



Laura Schneider

February 2, 2007

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

Dear Ms. Bender:

My wife and I are writing to you in reference to legislation being proposed by lawmakers in PA in an effort to improve the living conditions of animals that live in commercial breeding facilities. We sincerely applaud your efforts to do this and we thank you for your work on behalf of those poor animals.

We enthusiastically support this legislation, and it is our hope that legislators will not bend to the special interests of groups who are allowing their collective financial self-interest to supersede the overall welfare of the dogs that live in these commercial breeding facilities. As you are no doubt 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. As dog owners all our lives, and dog lovers, we thank you for your efforts. God bless you.

However, it is our hope that the final legislation will not interfere with the work of shelters and rescues who are already working tirelessly on behalf of animals. Thanks again for whatever you can do.

Sincerely,


Joe and JoAnn Folz
242 Southview Drive
Delran, New Jersey 088075

Scott Mulhern
36 Hart Avenue
Hopewell, NJ 08525

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.

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Most sincerely,


Scott Mulhern

Helen Carpenter
359 Cedar Ave
Langhorne, PA 19047

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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My family and I are conscientious and regular voters in Pennsylvania. We will be looking at the outcome of this legislation to help guide us in the next election. We are animal lovers and have recently adopted a rescued dog.

Most sincerely,



Helen Carpenter

cc: Chris King

Ann & Steve McCurdy

3615 Redfield Drive
Greensboro, NC 27410
336-288-2115

February 5, 2007

PRIVILEGED & CONFIDENTIAL

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

Dear Ms. Bender:

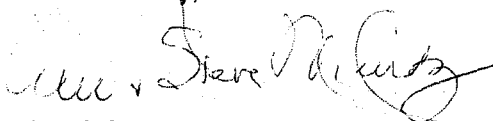
We are writing to you in reference to the new legislation being proposed by lawmakers in Pennsylvania in an effort to improve the living conditions of animals that live in commercial breeding facilities. We would like to applaud your efforts and thank you for your work on behalf of those who have no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

We are writing to enthusiastically support this legislation. It is our hope that legislators will not bend to the special interests of groups who are allowing their collective financial self-interest to supersede 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, poor nutrition, no socialization, no opportunity for regular exercise or to just be somebody's much loved pet. It is unfortunate indeed that some turn a blind eye to the suffering of these helpless animals. We fully realize that these are the facilities that this legislation is intended to regulate more effectively.

We had a "puppy mill" dog. Sadly, her health was never good and her life was far too short, but in all of her life with us, she was loved and cared for in spite of her early beginnings.

Once again, we applaud your efforts on behalf of the helpless animals that are suffering in the state of Pennsylvania at this very moment due to the greed of certain individuals. We hope that you will work tirelessly to see to it that this legislation can be passed and become law. It is our 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, we would like to once again express our support of this legislation.

Most sincerely,



Ann & Steve McCurdy



Kristen A. Small
23 York Road
Wilmington, DE 19803

(302) 658-3323

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.

Sincerely,



Kristen A. Small

Sharon K. Small
303 Lawnfield Way
Kennett Square, PA 19348

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.

Sincerely,



Sharon K. Small

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.

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,

Ronald A. Peabody 2-5-07

CHESAPEAKE SAFE HARBOR, INC
113 WALDOBORO RD
BREMEN, ME 04551-3406

- a non-profit rescue corp.

Nora Ventresca
110 Decatur Street
Doylestown, PA 18901

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

February 5, 2007

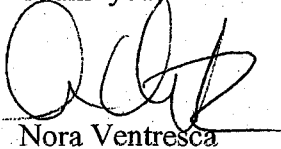
Dear Ms. Bender:

I am writing to you today to urge you to adopt stricter and more humane legislation regarding puppy mills in the State of Pennsylvania. No doubt you are well aware of the horrible conditions at many of these puppy mills.

These innocent dogs, who deserve a life so much better than the one fate has handed them, are counting on you to help them. All you have to do is look into one set of these big, brown, helpless eyes and the answer is clear:

Stop the Puppy Mills or at LEAST enforce humane regulations at these places. You have the power to do something, so please do it.

Thank you.



Nora Ventresca

Cc: Arthur Coccodrilli, Independent Regulatory Review Commission
Edward Rendell, Governor, State of Pennsylvania

Liz Neuch
16889 Parker Road
Union City, PA 16438
neuch@verizon.net

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

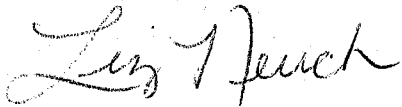
Dear Ms. Bender,

I am writing to ask you to support the proposed changes to the kennel regulations which would greatly improve conditions in Pennsylvania's "puppy mills". Simple decency requires us to provide these dogs with more space, protection from the elements, and especially exercise time outside their cages every day.

I think there should be an exemption for shelters and foster homes because these are run by charitable people who are doing their best to help stray animals as opposed to making a buck off the suffering of animals.

Thank you for considering my comments. I hope decency and kindness will prevail in our dealings with animals.

Sincerely,

A handwritten signature in cursive script that reads "Liz Neuch". The signature is written in dark ink and is positioned to the left of the typed name.

Liz Neuch

7 February 2007

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

RE: Comments on proposed Dog law regulations

Dear Ms. Bender,

As a resident of Pennsylvania and Board Member of the Adams County SPCA, I am writing to urge you to support the proposed amendments to the Dog Law regulations set forth by the Pennsylvania Department of Agriculture and the Bureau of Dog Law Enforcement.

Unfortunately, our Commonwealth has earned the reputation as the "Puppy Mill Capital of the East", a reputation that is not altogether undeserved. The problems are rampant and the time is way past due that these are corrected. The changes to the Dog Law regulations proposed by the Department of Agriculture and Bureau of Dog Law Enforcement will greatly improve the conditions under which so many unfortunate dogs are bred and raised commercially in Pennsylvania.

These new regulations will double the required cage size for dogs, improve sanitation, drainage and ventilation standards, require that all dogs be provided with a minimum of 20 minutes of exercise everyday and require prompt and immediate veterinary care for sick and injured dogs, among others.

The proposed regulations will not impose restrictions on small hobby breeders who raise fewer than 26 dogs in a year, contrary to what the breeding industry suggests. Nor will the regulations impact dog shows, dog parks, or other dog events held in the state. The regulations are aimed specifically at regulating large-scale commercial breeders.

It is in the state's best interest to provide humane care and conditions for dogs housed and bred in Pennsylvania's commercial kennels. The proposed regulations will better ensure that these dogs are disease-free, behaviorally sound and well cared for. As a constituent who volunteers with my county's SPCA and other dog rescue organizations, I respectfully request that you support the regulations and help move them through the regulatory process in an expeditious manner.

Thank you for your time and attention to this serious matter.

Sincerely,


Christine Ameduri

634 Highland Ave.
Gettysburg, PA 17325

Helena Goscilo
1015 Portland St.
Pittsburgh, PA 15206-1536

February 5, 2007

Department of Agriculture
Bureau of Dog Law Enforcement
Attn: Mary Bender
2301 North Cameron Street
Harrisburg, PA 17110-9408
Fax: 717-772-4352

Dear Ms Bender:

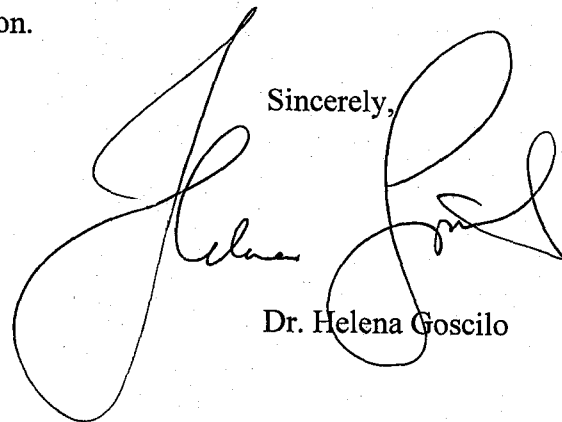
I am writing to voice my strong support for the more humane laws being proposed to regulate commercial dog breeding in Pennsylvania. That better regulation is essential may be deduced from the untenable practice under current regulations, which permit convicted animal abusers to continue obtaining kennel licenses.

I unreservedly endorse not only all the provisions for improving dogs' current conditions (larger cages, daily exercise, sanitation, temperate control adjusted to weather conditions, and so forth), but also those related to policing and penalizing violators of the regulations. I also understand and support the proposals by the Humane Society of the United States that shelters, which exist to help these animals rather than to exploit them, be exempted from expansion and exercise requirements and that canine foster homes be allowed greater leeway in housing requirements and performance standards.

Pennsylvania's notoriety as a puppy mill state is a disgrace. New regulations are essential for bringing us into conformity with the more humane standards of the 21st century.

Thank you for your attention, and, I hope, action.

Sincerely,



Dr. Helena Goscilo

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

Dear Ms. Bender,

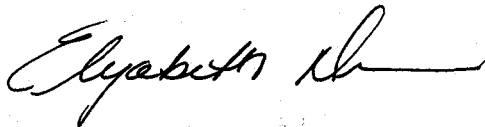
February 5, 2007

I am writing in support of the more humane regulations proposed to alter the unethical and outdated current kennel regulations. Pennsylvania's puppy mill industry displays a side of humanity that needs correction not only for the animals doomed to these horrific lives but to avoid the erosion of our current sense of overall ethics.

We hear on a regular basis that we need to improve our country's image throughout both our own borders and throughout the world. However if we allow cruelty, of any type to flourish, such as the current status of puppy mills has we encourage and endorse this behavior.

I greatly appreciate your time and your support of this issue.
Please feel free to contact me with any questions or concerns you may have.

Sincerely,



Elizabeth Duncan

Elizabeth C. Duncan
702 Stutzman Rd.
Indiana, PA, 15701
bduncan@arin.k12.pa.us

6 February 2007
Department of Agriculture
Bureau of Dog Law Enforcement
Attn: Mary Bender
2301 North Cameron Street
Harrisburg, PA 17110-9408

Hello!

I am writing in support of proposed changes to kennel regulations including:

- » doubling the minimum cage size
- » requiring daily exercise outside of the cage
- » required heat when the temperature drops below 50 degrees
- » required cooling (by fan or air conditioning) when the temperature rises above 85 degrees
- » improving ventilation in kennel areas
- » denying kennel licenses to individuals convicted of animal cruelty within the past 10 years

In general, I believe we must end the shameful treatment of all animals; including those raised as a food source. We need not torture animals before we eat them.

Regards,
Michael Frailey

Cc Arthur Coccodrilli, Chairman
Independent Regulatory Review Commission

Senator Gibson E. Armstrong

Hon. John C. Bear

R. NAGTEGAAL
P.O. Box 177
WASHINGTON CROSSING, PA 18977

February 5, 2007

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

RE: Provisions for Proposed Kennel Regulations

Dear Ms. Bender:

Please help to make Pennsylvania a more humane place for dogs used for mass breeding and profit by cleaning up the cruel puppy mills that brutalize dogs and tarnish the state's image.

Require the breeders of mass dogs for profit to:

- Double the minimum cage size, no chicken type wire for cage flooring
- Require daily exercise outside of the cage
- Require heat when the temperature drops below 50 degrees
- Require cooling (by fan or air conditioning) when the temperature rises above 85 degrees
- Improve ventilation in kennel areas
- Denying kennel licenses to individuals convicted of animal cruelty within the past 10 years

➤ Also, comments submitted by The Humane Society of the United States should be considered and included as guidelines.

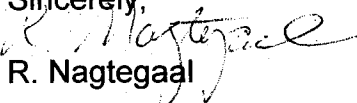
Make exemptions to animal welfare shelters for homeless or stray dogs:

- Please make an exemption for shelters from the kennel expansion and exercise requirements.
- Foster homes should be exempt from kennel housing requirements and instead have separate performance standards appropriate for home care settings.

Thank you to Governor Ed Rendell and his commitment to help the tens of thousands of dogs affected by Pennsylvania puppy mills.

Please correct the appalling situations in puppy mills and help to erase this ugly mark from our beautiful state of Pennsylvania.

Sincerely,


R. Nagtegaal

Cc: Arthur Coccodrilli, Chairman, Independent Regulatory Review Commission
Governor Ed Rendell
Senator Bob Casey
Senator Arlen Specter
Representative Patrick Murphy

February 4, 2007

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

Dear Madam:

I am writing today to show my passionate support for the proposed new regulations for kennels. As these beautiful creatures cannot speak or write for themselves, it is up to us to be their pen and their voice. It blows my mind how people can treat these dogs with such disrespect, as if they were nothing more than common garbage. As someone who cannot have children, I have committed my life to dogs. It pains me to see the pictures and hear the stories of how these animals are treated in puppy mills.

In particular, I feel the following aspects of the new regulations are especially important:

- doubling the minimum cage size
- requiring daily exercise outside of the cage
- required heat when the temperature drops below 50 degrees
- required cooling (by fan or air conditioning) when the temperature rises above 85 degrees
- improving ventilation in kennel areas
- denying kennel licenses to individuals convicted of animal cruelty within the past 10 years
- assuring that all dogs have access to fresh water at all times

I do believe that shelters and foster homes should be exempt from these certain aspects of the regulations above. As shelters are a temporary stay, a smaller cage is okay, to ensure the shelters have the capacity to help as many animals as possible. Regarding foster homes, there should be a different set of regulations to ensure the proper home care is provided.

If these were human babies, this would never be allowed to happen. So, why is it okay when it is dogs? It's not! Thank you for your time.

Sincerely,

Susan Moyer

Darren Paul Strain
4824 Shepherd Street
Brookhaven, PA 19015-1124
February 4, 2007

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

Dear Ms. Bender:

I am encouraged by Governor Rendell's commitment to help the tens of thousands of dogs affected by Pennsylvania's puppy mills. I am writing to express my support of the proposed changes to the outdated kennel regulations. Specifically, I am in favor of the following proposed requirements:

- doubling the minimum cage size
- requiring daily exercise outside of the cage
- required heat when the temperature drops below 50 degrees
- required cooling (by fan or air conditioning) when the temperature rises above 85 degrees
- improving ventilation in kennel areas
- denying kennel licenses to individuals convicted of animal cruelty within the past 10 years

I would also like to express my support of the detailed comments submitted by The Humane Society of the United States. In order to ensure that the proposed requirements are applied to puppy mills, and not legitimate shelters and rescue groups, I would like to request an exemption for shelters from the kennel expansion and exercise requirements. In addition, foster homes should be exempt from kennel housing requirements and instead have separate performance standards appropriate for home care settings.

My wife and I agree that this is an important issue which will undoubtedly impact our voting decisions. I truly hope that Pennsylvania will take these important steps toward improving the conditions for dogs in puppy mills.

Thank you for allowing me the opportunity to express my opinions.

Sincerely,



Darren Paul Strain

February 3, 2007

DEPARTMENT OF AGRICULTURE
BUREAU OF DOG LAW ENFORCEMENT
ATTN: MARY BENDER
2301 NORTH CAMERON STREET
HARRISBURG PA 17110-9408

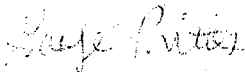
Dear Ms. Bender:

I am writing to show my support for the new, more humane regulations that affect dogs in puppy mills across Pennsylvania. With your support, changes to the regulations could include:

- Doubling the minimum cage size
- Requiring daily exercise outside of the cage
- Heating and cooling below 50 degrees and above 85 degrees
- Improving ventilation
- Denying kennel licenses to anyone convicted of cruelty in the past 10 years.

Please support The Humane Society of the United States, Gov. Ed Rendell and myself in supporting these important regulations. Thank you.

Sincerely,



Gaye Pritts
30 Mohawk Drive
Greensburg PA 15601

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

February 6,2007

Dear Ms. Bender:

I am writing you in support of the amended Dog Law Regulations which were posted on the Pennsylvania Bulletin. I am fully in support of

1. Doubling the cage requirements that currently exist
2. Provide 20 minutes, possibly more, time for exercise for each dog daily.
3. Provide heat when temperature drops below 50 degrees and cooling when temperature rises above 85 degrees.
4. Provide better lighting and frequent air changes for ventilataion.
5. Remove all dogs from their cages/kennels during cleaning.

6. Deny kennel licenses for those convicted of animal cruelty within the past 10 years. I would prefer never granting these people a kennel license.

Please consider the suffering animals go through and how many times they have litters until they can no longer, physically, produce.

Thank you,

Carol A. Clonen

Carol A. Clonen
4015 Green Park Drive
Mt. Joy, Pa. 17552

s.

C. Kathleen Jordan
1930A Green Street
Philadelphia, PA 19130
greenstct1@aol.com

Sunday, February 4, 2007

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

Dear Ms. Bender:

This letter is to support the long overlooked and outdated kennel regulations that have been proposed. Tens of thousands of dogs have suffered cruel and inhumane lives because of the old laws. I support changes to the regulations that affect dogs in puppy mills including the following requirements:

- Doubling the minimum cage size.
- Requiring daily exercise outside of the cage
- Required heat when the temperature drops below 50 degrees
- Required cooling (by fan or air conditioning) when the temperature rises above 85 degrees.
- Improved ventilation in kennel areas
- Denying kennel licenses to individuals convicted of animal cruelty within the past 10 years.
- Enforcement of these changes

In addition to the provisions above, I also support the detailed comments submitted by The Humane Society of the United States.

However, I do ask for an exemption for shelters from the kennel expansion and exercise requirements. Foster homes should also be exempt from kennel housing requirements and instead have separate performance standards appropriate for shelters and home care settings. We cannot afford to loose foster homes in the effort to save more lives and prevent cruelty.

Your support of the new laws where animals will be treated with respect and a conscience, and not be subject to harm and cruelty is requested. Should you need to contact me, I can be reached at the email address noted above.

Cordially,


C. Kathleen Jordan

cc: Arthur Coccodrilli, Chairman Independent Regulatory Review Commission

Robert and Alice Muehlhof
24 Dechert Road
Conshohocken, PA 19428

In regards to: Proposed changes to PA kennel laws

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

Dear Ms. Bender,

This letter is written in support of the proposals to provide dogs in Pennsylvania puppy mills with more humane treatment, specifically more space, better protection from the elements and time outside of their cages for exercise.

My wife and I support the detailed comments submitted by the Humane Society of the United States. In addition, we urge that you note the necessity to allow exemptions for animal shelters and foster homes.

Respectfully yours,



Bob and Alice Muehlhof

Cc: Pa. State Senator Vincent Hughes
Pa. State Representative Mike Gerber

Carol Regueiro
624 Poia Place
Sewickley, PA 15143

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

February 4, 2007

Dear Ms. Bender,

I am writing in support of proposed changes to regulations for commercial dog breeding operations in Pennsylvania.

Provisions, such as requiring bare minimum standards for heating and cooling, and excluding those convicted of animal cruelty from operating breeding facilities, are entirely consonant with civilized society.

In addition, animal rescue and shelter facilities, operating on very slim budgets and with entirely different goals, should be allowed some exemptions to space and exercise standards and should be required to adhere to equally civilized, but differing standard, reflecting their differing missions.

I appreciate your consideration.


Carol R. Regueiro

February 5, 2007

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

Dear Ms. Bender,

As a concerned Pennsylvanian, I greatly appreciate how hard Governor Ed Rendell is working toward eliminating the cruelty of puppy mills. I strongly support the proposed regulations of improving living conditions for animals in puppy mills, and with your help, these improvements could become a reality. Also, I ask that foster homes should not be accounted for, and instead should have different standards fit for home care settings.

As you may already know, some of the revisions include bettering ventilation in kennels, doubling the minimum cage size, and requiring adequate physical exercise outside of cages. These improvements would considerably help the lives of many confined animals.

Please, I truly urge you to support proposed provisions regarding the welfare of puppy mill animals, and to exempt foster homes from these regulations and provide separate regulations for them.

Sincerely,



Timmy Woitas
1746 O'Block Rd.
Plum, PA 15239-2330

Ms Margaret B Goscilo
258 Shady Ave Apt 5
Pittsburgh PA 15206-4346

February 2, 2007

Department of Agriculture
Bureau of Dog Law Enforcement
Attn: Mary Bender
2301 North Cameron Street
Harrisburg, PA 17110-9408
Fax: 717-772-4352

Dear Ms Bender:

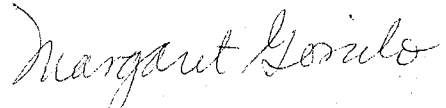
I am writing to express my support for the more humane laws being proposed to regulate commercial dog breeding in Pennsylvania. Surely just the fact that current regulations allow convicted animal abusers to continue obtaining kennel licenses makes clear how overdue such change is.

I strongly support all the provisions for improving dogs' current conditions (bigger cages, daily exercise, sanitations, heat or cooling appropriate to the weather, etc.) as well as those related to policing and penalizing violations of the regulations. I also understand and support the Humane Society of the United States' proposals that shelters, which exist to help these animals rather than to exploit them, be exempted from expansion and exercise requirements and that canine foster homes be allowed greater leeway in housing requirements and performance standards.

Pennsylvania's notoriety as a puppy mill state is shameful: we need the new regulations to help bring us into the more humane standards of the 21st century.

Thank you for your attention,

Sincerely,



Dr. Margaret Goscilo

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

January 25, 2007

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

Dear Ms. Bender:

I am so against the awful puppy mills and the lack of care ^{of} these sweet defenseless animals that cannot defend themselves.

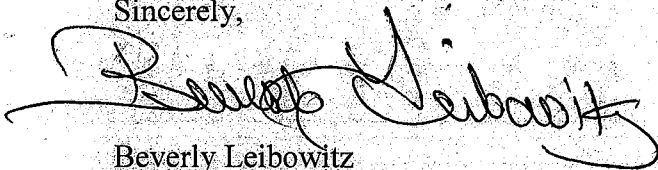
I fully support the proposed kennel regulations.

I believe that the proposed regulations will greatly help stop the cruelty that these puppy mill owners subject their dogs to.

The new regulations will also make Pennsylvania's Department of Agriculture a national leader and people won't have to worry about purchasing a dog or puppy from these places because they will know that the dog or puppy was raised under loving conditions.

Once again, I support and encourage the proposed kennel regulations!

Sincerely,



Beverly Leibowitz
2642 Stagecoach Lane
Lancaster, PA 17601

February 2, 2007

Mary Bender, Director, Bureau of Dog Law Enforcement
2301 N. Cameron St., Room 102
Harrisburg, Pa. 17110

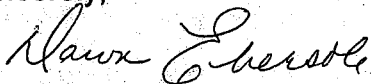
Dear Ms. Bender:

My name is Dawn Ebersole and I would like to add my voice to the proposed change to Pennsylvania's regulations in regards to dog breeding. I have personal experience with an animal that had genetic defects due to its breeding. She went through a lot during her short life. The animals used for breeding are not just merchandise used to make money. Any dog used for breeding should be screened for genetic defects. Their living conditions should be clean, healthy and humane.

I believe that changes to the Regulations are needed to address unethical and inhumane kennel conditions and provide the dogs housed there with a better overall quality of life.

I support changes to the Regulations which provide definitive and measurable guidelines and which increase the quality of a dog's existence while confined to a kennel environment. These changes are long overdue.

Sincerely,



Dawn Ebersole
2430 Guilford Street
Lebanon, Pa 17046

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

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 three companion dogs, 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,



AMANDA M. MUZA
5 BYRON NELSON CIRCLE
ETTERS, PA 17319

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

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 three companion dogs, 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,



TRACY S. MUZA
5 BYRON NELSON CIRCLE
ETTERS, PA 17319

2559

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

RECEIVED

2007 FEB -8 AM 11: 23

INDEPENDENT REGULATORY
REVIEW COMMISSION

January 31, 2007

Dear Chairman Coccodrilli,

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

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

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

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

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

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

Yours sincerely,



Marvin Zimmerman
1551 Weaverland Road
East Earl, PA 17519

RECEIVED

Bureau of Dog Law Enforcement
Pennsylvania Department of Agriculture -7 PM 2:14
Attn: Ms. Mary Bender
2301 North Cameron Street
Harrisburg, PA 17110-9408

INDEPENDENT REGULATORY
REVIEW COMMISSION

January 19, 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, *Raymond Martin*

Raymond H. Martin
954 Center Church Road
East Earl, PA 17519-9310

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 -7 PM 2:13

INDEPENDENT REGULATORY
REVIEW COMMISSION

January 27, 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,



Windy Pines Kennel
370 California Rd
Morgantown, PA 19543

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 -7 PM 2:13

INDEPENDENT REGULATORY
REVIEW COMMISSION January 22, 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,

Alden L. Martin

Vicksburg Kennel
955 Beaver Run Rd
Mifflinburg, PA 17844

2559

Martin's Kennel
557 S. 4th St.
Mifflinburg, PA 17844

RECEIVED

2007 FEB -8 AM 11:19

January 20, 2007

INDEPENDENT REGULATORY
REVIEW COMMISSION

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

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

Dear Mr. Jewett,

I am writing in 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,

Linus & Irene Martin

Linus & Irene Martin
557 South 4th St.
Mifflinburg, PA 17844

2559

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

RECEIVED

2007 FEB -8 AM 11: 22

January 31, 2007

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.

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,



Rueben . Zook
34 Oak Bend Rd.
Newburg, PA 17240

2559

Pine Ridge Kennels
James L. Houppert (Owner)
24104 Watters Rd
Shade Gap, PA 17255

February 2, 2007

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

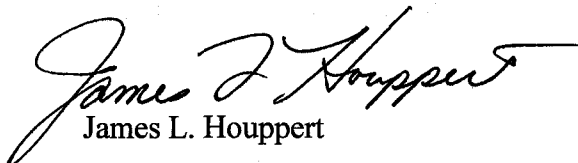
Dear Chairman Coccodrilli,

I am writing concerning the proposed regulation ID #2-152(#2559) revising the Dog Law Act 225 which was issued on December 16, 2006.

I fully understanding that the bureau is trying to improve substandard kennel conditions. I would welcome measures that would control irresponsible "puppy mills", but the proposed revision contains several restrictions and requirements that would be an unnecessary burden to responsible kennel owners, trainers and breeders.

I sincerely urge that this proposal not be adopted.

Sincerely,


James L. Houppert

RECEIVED
2007 FEB -8 AM 11:18
INDEPENDENT REGULATORY
REVIEW COMMISSION

Farm Letter
11

RECEIVED

2559

2007 FEB -7 PM 2:14

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

January 21, 2007

Dear Ms. Bender:

Having purchased dogs from wonderful, ethical, breeders and boarded them in clean, air conditioned/heated boarding kennels, owned and operated by animal loving, ethical professionals, I feel compelled to voice my opinion. Although, perhaps, well intentioned, the proposed amendments of December 16, 2006 to the Pennsylvania Dog Law Regulations greatly concern me. I agree that inhumane and substandard kennel conditions should not be tolerated, however, I emphatically disagree with the proposed regulatory changes. I believe these changes are impractical, will create a great burden from a financial standpoint, will not be enforceable and, most importantly, will not improve the quality of the lives of the dogs entrusted to the aforementioned, ethical breeders and boarding kennels. These regulations will also require wholesale renovation, if not rebuilding of many kennels already built in compliance with current federal and/or state standards. Small, boarding kennels, and breeding facilities, whose care and conditions are far superior to those required by the proposed new standards, would be unable to comply with the rigid commercial kennel standards. These small breeders and boarding kennels would be forced out of business, face a loss of income, and deprive their communities of their outstanding services. I strongly urge that this proposal be withdrawn .

Sincerely,


Gloria M. Majewski

2559

Robert and Alice Muehlhof
24 Dechert Road
Conshohocken, PA 19428

In regards to: Proposed changes to PA kennel laws

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

RECEIVED
2007 FEB -8 AM 11:18
INDEPENDENT REGULATORY
REVIEW COMMISSION

Dear Chairman Coccodrilli,

This letter is written in support of the proposals to provide dogs in Pennsylvania puppy mills with more humane treatment, specifically more space, better protection from the elements and time outside of their cages for exercise.

My wife and I support the detailed comments submitted by the Humane Society of the United States. In addition, we urge that you note the necessity to allow exemptions for animal shelters and foster homes.

Respectfully yours,



Bob and Alice Muehlhof

Cc: Pa. State Senator Vincent Hughes
Pa. State Representative Mike Gerber

2559

RECEIVED

February 2, 2007

2007 FEB -02 AM 11:13

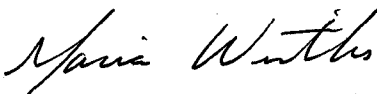
INDEPENDENT REGULATORY
REVIEW COMMISSION

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

Dear Ms. Bender:

Please clean up Pennsylvania's cruel puppy mills, which brutalize dogs and tarnish the state's image. I respectfully urge you to adopt the new, more humane regulations for commercial breeding operations in Pennsylvania. Further, I fully support the detailed comments submitted by The Humane Society of the United States regarding more humane regulations.

Sincerely,



Maria Wirths
1023 Fairhill Road
Sellersville, PA 18960

CC:

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

2559

RECEIVED

2007 FEB -8 AM 11:18

INDEPENDENT REGULATORY
REVIEW COMMISSION

February 5, 2007

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

Dear Mr. Coccodrilli,

As a concerned Pennsylvanian, I greatly appreciate how hard Governor Ed Rendell is working toward eliminating the cruelty of puppy mills. I strongly support the proposed regulations of improving living conditions for animals in puppy mills, and with your help, these improvements could become a reality. Also, I ask that foster homes should not be accounted for, and instead should have different standards fit for home care settings.

As you may already know, some of the revisions include bettering ventilation in kennels, doubling the minimum cage size, and requiring adequate physical exercise outside of cages. These improvements would considerably help the lives of many confined animals.

Please, I truly urge you to support proposed provisions regarding the welfare of puppy mill animals, and to exempt foster homes from these regulations and provide separate regulations for them.

Sincerely,



Timmy Woitas
1746 O'Block Rd.
Plum, PA 15239-2330

2559

RECEIVED

2007 FEB -8 AM 11:17

INDEPENDENT REGULATORY
REVIEW COMMISSION

Carol Regueiro
624 Poia Place
Sewickley, PA 15143

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

February 4, 2007

Dear Mr. Coccodrilli,

I am writing in support of proposed changes to regulations for commercial dog breeding operations in Pennsylvania.

Provisions, such as requiring bare minimum standards for heating and cooling, and excluding those convicted of animal cruelty from operating breeding facilities, are entirely consonant with civilized society.

In addition, animal rescue and shelter facilities, operating on very slim budgets and with entirely different goals, should be allowed some exemptions to space and exercise standards and should be required to adhere to equally civilized, but differing standard, reflecting their differing missions.

I appreciate your consideration.


Carol R. Regueiro

2559

February 8, 2007

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

INDEPENDENT REGULATORY
REVIEW COMMISSION

2007 FEB -8 PM 4:58

RECEIVED

RE: Proposed Changes to Pennsylvania Dog Law Enforcement

Dear Ms. Bender;

It is deplorable that Pennsylvania has been labeled the 'puppy mill capital of the East' – this is not a title of which to be proud. However, as a dedicated animal rights advocate and the guardian of two companion animals, I was elated to hear of Governor Rendell's commitment to improving the conditions within local dog breeding operations.

I urge you to permanently institute the proposed changes to kennel regulations set forth on December 16, 2006, which call for, among others, the following improvements to current requirements:

- double the minimum cage size
- require daily exercise outside of the cage
- require heat when the temperature drops below 50 degrees
- require cooling (by fan or air conditioning) when the temperature rises above 85 degrees
- improve ventilation in kennel areas
- deny kennel licenses to individuals convicted of animal cruelty within the past 10 years

Additionally, there should be an exemption for shelters from the kennel expansion and exercise requirements. Also, foster homes should be exempt from kennel housing requirements and instead have separate performance standards appropriate for home care settings.

It is in the state's best interest to provide humane care and conditions for dogs housed and bred in Pennsylvania's commercial kennels. The proposed regulations will better ensure that dogs are disease-free, behaviorally sound, and well cared for.

Thank you for your attention and consideration.

Sincerely,



Christopher Derer
41 Barclay Court
Blue Bell, PA 19422

cc. Representative Mike Gerber
Senator John Rafferty
Arthur Coccodrilli, Chairman, 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

RECEIVED

2007 FEB -7 PM 2:14

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,



Donna's Pets Kennel
36 Kuhn Kennel Lane
Enon Valley, PA 16120

2559

R. NAGTEGAAL
P.O. Box 177
WASHINGTON CROSSING, PA 18977

February 5, 2007

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

RECEIVED

2007 FEB -8 AM 11:18

INDEPENDENT REGULATORY
REVIEW COMMISSION

RE: Provisions for Proposed Kennel Regulations

Dear Ms. Bender:

Please help to make Pennsylvania a more humane place for dogs used for mass breeding and profit by cleaning up the cruel puppy mills that brutalize dogs and tarnish the state's image.

Require the breeders of mass dogs for profit to:

- Double the minimum cage size, no chicken type wire for cage flooring
- Require daily exercise outside of the cage
- Require heat when the temperature drops below 50 degrees
- Require cooling (by fan or air conditioning) when the temperature rises above 85 degrees
- Improve ventilation in kennel areas
- Denying kennel licenses to individuals convicted of animal cruelty within the past 10 years

➤ Also, comments submitted by The Humane Society of the United States should be considered and included as guidelines.

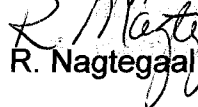
Make exemptions to animal welfare shelters for homeless or stray dogs:

- Please make an exemption for shelters from the kennel expansion and exercise requirements.
- Foster homes should be exempt from kennel housing requirements and instead have separate performance standards appropriate for home care settings.

Thank you to Governor Ed Rendell and his commitment to help the tens of thousands of dogs affected by Pennsylvania puppy mills.

Please correct the appalling situations in puppy mills and help to erase this ugly mark from our beautiful state of Pennsylvania.

Sincerely,


R. Nagtegaal

Cc: Arthur Coccodrilli, Chairman, Independent Regulatory Review Commission
Governor Ed Rendell
Senator Bob Casey
Senator Arlen Specter
Representative Patrick Murphy

2559

February 4, 2007

RECEIVED

2007 FEB -8 AM 11:17

INDEPENDENT REGULATORY
REVIEW COMMISSION

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

Dear Sir:

I am writing today to show my passionate support for the proposed new regulations for kennels. As these beautiful creatures cannot speak or write for themselves, it is up to us to be their pen and their voice. It blows my mind how people can treat these dogs with such disrespect, as if they were nothing more than common garbage. As someone who cannot have children, I have committed my life to dogs. It pains me to see the pictures and hear the stories of how these animals are treated in puppy mills.

In particular, I feel the following aspects of the new regulations are especially important:

- doubling the minimum cage size
- requiring daily exercise outside of the cage
- required heat when the temperature drops below 50 degrees
- required cooling (by fan or air conditioning) when the temperature rises above 85 degrees
- improving ventilation in kennel areas
- denying kennel licenses to individuals convicted of animal cruelty within the past 10 years
- assuring that all dogs have access to fresh water at all times

I do believe that shelters and foster homes should be exempt from these certain aspects of the regulations above. As shelters are a temporary stay, a smaller cage is okay, to ensure the shelters have the capacity to help as many animals as possible. Regarding foster homes, there should be a different set of regulations to ensure the proper home care is provided.

If these were human babies, this would never be allowed to happen. So, why is it okay when it is dogs? It's not! Thank you for your time.

Sincerely,

Susan Moyer

2559

February 3, 2007

RECEIVED

ARTHUR COCCODRILLI, CHAIRMAN
INDEPENDENT REGULATORY REVIEW COMMISSION
333 MARKET STREET, 14TH FLOOR
HARRISBURG PA 17101

2007 FEB -8 AM 11:17

INDEPENDENT REGULATORY
REVIEW COMMISSION

Dear Mr. Coccodrilli:

I am writing to show my support for the new, more humane regulations that affect dogs in puppy mills across Pennsylvania. With your support, changes to the regulations could include:

- Doubling the minimum cage size
- Requiring daily exercise outside of the cage
- Heating and cooling below 50 degrees and above 85 degrees
- Improving ventilation
- Denying kennel licenses to anyone convicted of cruelty in the past 10 years.

Please support The Humane Society of the United States, Gov. Ed Rendell and myself in supporting these important regulations. Thank you.

Sincerely,



Gaye Pritts
30 Mohawk Drive
Greensburg PA 15601

2007 FEB 08 AM 11:17
INDEPENDENT REGULATORY
REVIEW COMMISSION

2007 FEB 08 AM 11:17

INDEPENDENT REGULATORY REVIEW COMMISSION

333 MARKET STREET, 14TH FLOOR, HARRISBURG, PA 17101

PH: 717-333-1000 FAX: 717-333-1001

WWW.IRRC.PA.GOV

2559

Darren Paul Strain
4824 Shepherd Street
Brookhaven, PA 19015
February 4, 2007

RECEIVED

2007 FEB -8 AM 11:17

INDEPENDENT REGULATORY
REVIEW COMMISSION

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

Dear Chairman Coccodrilli:

I am encouraged by Governor Rendell's commitment to help the tens of thousands of dogs affected by Pennsylvania's puppy mills. I am writing to express my support of the proposed changes to the outdated kennel regulations. Specifically, I am in favor of the following proposed requirements:

- doubling the minimum cage size
- requiring daily exercise outside of the cage
- required heat when the temperature drops below 50 degrees
- required cooling (by fan or air conditioning) when the temperature rises above 85 degrees
- improving ventilation in kennel areas
- denying kennel licenses to individuals convicted of animal cruelty within the past 10 years

I would also like to express my support of the detailed comments submitted by The Humane Society of the United States. In order to ensure that the proposed requirements are applied to puppy mills, and not legitimate shelters and rescue groups, I would like to request an exemption for shelters from the kennel expansion and exercise requirements. In addition, foster homes should be exempt from kennel housing requirements and instead have separate performance standards appropriate for home care settings.

My wife and I agree that this is an important issue which will undoubtedly impact our voting decisions. I truly hope that Pennsylvania will take these important steps toward improving the conditions for dogs in puppy mills.

Thank you for allowing me the opportunity to express my opinions.

Sincerely,



Darren Paul Strain

2559

Department of Agriculture
Bureau of Dog Law Enforcement
Attn: Mary Bender
2301 North Cameron Street
Harrisburg, PA 17110-9408
Fax: 717-772-4352

RECEIVED

2007 FEB -8 AM 11:18

INDEPENDENT REGULATORY
REVIEW COMMISSION

Arthur Coccodrilli, Chairman
Independent Regulatory Review Commission
333 Market Street, 14th Floor
Harrisburg, PA 17101
Fax: 717-783-2664

Attention Mary Bender and Arthur Coccodrilli:
Pennsylvania—nicknamed the "puppy mill capital of the East" because so many puppy mills call the state home—may soon become a more humane place for pooches. **How embarrassing!** Thanks to Governor Ed Rendell's commitment to help the tens of thousands of dogs affected by Pennsylvania puppy mills, the issue has been getting a lot of attention and, on Dec. 16, changes to the outdated kennel regulations—currently used to inspect commercial breeding operations in Pennsylvania—were proposed.

The proposed changes could improve the living conditions of dogs who currently suffer in puppy mills. Although, my preference is to END puppy mills all together lets at least make their conditions acceptable and HUMANE. We have so many shelters and homeless dogs, we should heavily fine and tax the puppy mills and send benefits to the shelters. Also, it would be great to give a small state tax credit to those that adopt shelter dogs. If someone wants a purebred, let them work with a certified breeder! Please support this cause!

With your support, changes to the regulations that affect dogs in puppy mills could include the following requirements:

- » doubling the minimum cage size
- » requiring daily exercise outside of the cage
- » required heat when the temperature drops below 50 degrees
- » required cooling (by fan or air conditioning) when the temperature rises above 85 degrees
- » improving ventilation in kennel areas
- » denying kennel licenses to individuals convicted of animal cruelty within the past 10 years

Kindest regards, Nancy Clarke
1030 Lakeside Drive
McDonald, PA 15057



RECEIVED

2007 FEB -8 AM 11: 22

INDEPENDENT REGULATORY
REVIEW COMMISSION

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

January 30, 2007

Dear Chairman Coccodrilli,

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

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

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

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

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

I sincerely request that this proposal be withdrawn.

Yours Sincerely,

Raymond Fisher, owner

Fisher's Kennel
45 Fisher Acres Lane
Pine Grove, PA 17963

2559

RECEIVED

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

2007 FEB -8 AM 11: 22

INDEPENDENT REGULATORY
REVIEW COMMISSION

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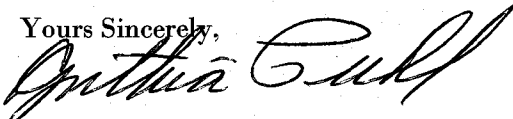
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Yours Sincerely,



Fleetwood Kennel
117 Reservoir Rd
Ringtown, PA 17967

2559

RECEIVED

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

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INDEPENDENT REGULATORY
REVIEW COMMISSION

January 30, 2007

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Yours Sincerely,


Fogle's Dog Training & Boarding
865 Mark Hanna Rd
Ashville, PA 16613

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

RECEIVED

2007 FEB -8 AM 11:20

January 27, 2007

INDEPENDENT REGULATORY
REVIEW COMMISSION

Dear Chairman Coccodrilli,

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I sincerely request that this proposal be withdrawn.

Yours Sincerely,



Drakenberg Dobermans
292 Willard Dr.
Ridley Park, PA 19078

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

RECEIVED

2007 FEB -8 AM 11:20

January 31, 2007

INDEPENDENT REGULATORY
REVIEW COMMISSION

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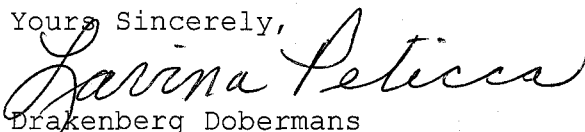
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Yours Sincerely,



Drakenberg Dobermans
292 Willard Dr.
Ridley Park, PA 19078

2559

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

RECEIVED

2007 FEB -8 AM 11:20

INDEPENDENT REGULATORY
REVIEW COMMISSION

January 26, 2007

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I sincerely request that this proposal be withdrawn.

Yours Sincerely,



Deep Run Kennel
960 Stracks Dam Rd
Lebanon, PA 17046

2559

Susan A Newton
635 S. Sixth St.
Jeannette, PA 15644

RECEIVED

2007 FEB -6 AM 10:46

INDEPENDENT REGULATORY
REVIEW COMMISSION

January 30, 2007

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

Dear Chairman Coccodrilli,

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

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

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

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

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

Yours truly,



2559

Levi S Nolt
134 Center Square Road
Leola, PA 17540

January 30, 2007

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

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Yours truly, *Levi S. Nolt*

RECEIVED

2007 FEB -8 AM 11: 20

INDEPENDENT REGULATORY
REVIEW COMMISSION

2559

January 24, 2007

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

RECEIVED

2007 FEB -8 AM 11:20

INDEPENDENT REGULATORY
REVIEW COMMISSION

Dear Chairman Coccodrilli,

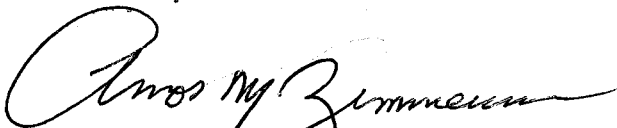
As a Pennsylvania breeder, I am strongly opposed to the overly restrictive rules and regulations that are proposed for kennel owners. The enforcement of regulations such as these will effectively serve to shut down or severely curtail the activities of the concerned, caring and law-abiding breeders in Pennsylvania. The extensive number of regulations outlined in this proposal and the limited time allotted prevents the proper consultation and review of these regulations with our kennel veterinarian and other professionals. Therefore, in order to allow for the proper review and consultation of this extensive proposal, I request a ninety-day extension of the comment period.

As a Pennsylvania breeder, my goal and the goal of other law-abiding breeders is to raise the best quality and healthiest puppy possible. This is not the issue. Unfortunately, the issue created by this proposal is my rights as a citizen of this state to own property, and my rights to be afforded due process guaranteed by the provisions of our state's constitution. The vagueness of this proposal causes great concern that my rights as a citizen will be omitted by the bias opinion of those who will hear my side of the story.

As a Pennsylvania breeder, I am concerned that these overly burdensome regulations will have severe unforeseen consequences. These include reduced number of breeders willing to deal with the excessive administrative burden caused by these regulations. The shortages of puppies and resulting higher prices, which will encourage the import of oversea and out of state puppies. The ensuing shortages will provide a lucrative opportunity for those who operate beneath the law to fill these shortages. Those who participate in this black market will find the rewards well worth the risk. Additionally, the economic loss to the state will be in the millions, and will go far beyond the breeder to include pet supply retailers, cities who sponsor shows, and state tax revenue.

As a Pennsylvania breeder, I believe it is unfortunate that this proposal appears to be more about animal activism than about animal welfare. You only have to consider the one section that permits shelters and other similar facilities that provide a "service" to be exempt from these regulations. I immediately question the intent behind those who are pushing the governor on this issue. What sense does it make to remove animals from a substandard facility and place them in another substandard facility? None! Furthermore, this proposal has no incentives or educational programs for the breeders. It is all threats and punishment, which is another indication, that the motives of those supporting this proposal are more interested in eliminating our industry than in improving our industry.

Sincerely,



Amos M. Zimmerman
1560 Weaverland Rd.
East Earl, PA 17519

January 24, 2007

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

RECEIVED

2007 FEB -8 AM 11:21

INDEPENDENT REGULATORY
REVIEW COMMISSION

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Sincerely,

End O' Lane Kennel

End O' Lane Kennels
283 Sinclair Road
Delta, PA 17314

David Fisher

January 24, 2007

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

RECEIVED

2007 FEB -8 AM 11: 21

INDEPENDENT REGULATORY
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January 24, 2007

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

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Sincerely,

Edna Martin



Edna Martin
762 Center Church Rd.
East Earl, PA 17519

2559

January 24, 2007

RECEIVED

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

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INDEPENDENT REGULATORY
REVIEW COMMISSION

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Sincerely,

Moses S. Lapp

MOSES S. LAPP
255 GIBBLE ROAD
MYERSTOWN PA 17067

2559

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

RECEIVED

2007 FEB -8 AM 11: 20

INDEPENDENT REGULATORY
REVIEW COMMISSION

January 26, 2007

Dear Chairman Coccodrilli,

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

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

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

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

Yours truly,



Rom-Ger-Ram Rottweilers
3614 Rt 982
Latrobe, PA 15650

2559

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

RECEIVED

2007 FEB -8 AM 11: 23

INDEPENDENT REGULATORY
REVIEW COMMISSION

January 31, 2007

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Yours truly,



Rocky-Knob Hill Kennel
261 Clouse Lane
East Earl, PA 17519

2559

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

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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,



Rocksteady Kennels & Pet Supplies
441 Sportsman Rd
Saltsburg, PA 15681

252559

Michael Martin
680 White Hollow Road
East Earl, PA 17519

RECEIVED

2007 FEB -8 AM 11: 22

INDEPENDENT REGULATORY
REVIEW COMMISSION

January 30, 2007

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

Dear Chairman Coccodrilli,

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

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

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

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

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

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

Yours Sincerely,

Michael Martin

2559

**Sharon Lee Kruger
106 Holzer Street
Pittsburgh, PA 15210**

RECEIVED

2007 FEB -6 AM 10:46

INDEPENDENT REGULATORY
REVIEW COMMISSION

January 26, 2007

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

Dear Chairman Coccodrilli,

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

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

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

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

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

Yours Sincerely,

Sharon Lee Kruger

2559

Lydia J Peachey
3530 E. Back Mountain Rd
Belleville, PA 17004

RECEIVED

2007 FEB -8 AM 11:23

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

INDEPENDENT REGULATORY
REVIEW COMMISSION

January 31, 2007

Dear Chairman Coccodrilli,

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

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

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.

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

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

Yours Sincerely,

Lydia J. Peachey

3530 E. Back Mtn. Rd.

Belleville, Pa. 17004

2559

M. M. E. Kennel
1551 Weaverland Road
East Earl, PA 17519

RECEIVED

2007 FEB -8 AM 11: 23

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

INDEPENDENT REGULATORY
REVIEW COMMISSION

January 31, 2007

Dear Chairman Coccodrilli,

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

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

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

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

Yours Sincerely,


Mary Ella Zimmerman

2559

Lonestar Kennel
2350 Weiss Rd
Quakertown, PA 18951

RECEIVED

2007 FEB -8 AM 11: 20

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

INDEPENDENT REGULATORY
REVIEW COMMISSION

January 31, 2007

Dear Chairman Coccodrilli,

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

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

Yours Sincerely,

Lone Star Kennels.
Quakertown Pa

2559

Amos L. Martin
557 S. 4th St.
Mifflinburg, PA 17844

RECEIVED

2007 FEB -8 AM 11:19

INDEPENDENT REGULATORY
REVIEW COMMISSION

January 30, 2007

IRRC

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

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

Dear Mr. Jewett,

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

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

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

Yours Sincerely,

Linus H. Martin
Martins Kennel
Linus & Irene Martin
557 South 4th St.
Mifflinburg, PA 17844

2359

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

RECEIVED

2007 FEB -8 AM 11: 22

INDEPENDENT REGULATORY
REVIEW COMMISSION

January 31, 2007

Dear Chairman Coccodrilli,

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

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

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

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

I sincerely urge that this proposal be rescinded.

Yours Sincerely,

Elton Horning

Elton Horning
17867 Rt. 104
Middleburg, PA 17842

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

RECEIVED

2007 FEB -8 AM 11: 20

January 23, 2007

INDEPENDENT REGULATORY
REVIEW COMMISSION

Dear Chairman Coccodrilli,

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

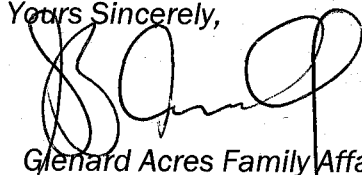
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I sincerely urge that this proposal be rescinded.

Yours Sincerely,



Glenard Acres Family Affair Kennel
Lake Roay Rd Box 197AC
New Milford, PA 18834

2559

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

RECEIVED

2007 FEB -6 AM 10:45

INDEPENDENT REGULATORY
REVIEW COMMISSION

January 23, 2007

Dear Chairman Coccodrilli,

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

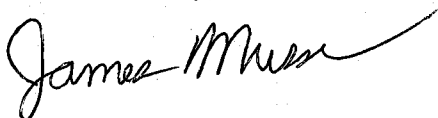
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The proposed changes make no sense for all kennel owners' dogs to be seized by the Dog Law Bureau based on the Governor's proposed new requirements for pen sized or quarantine regulations. Dog Law places the same dog into a humane society not required 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,



Golden Acres Kennel
151 Durlach Rd
Ephrata, PA 17522

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

Dear Ms. Bender:

My name is Phillip Hellwig, 38 Center Road, Erwinna, PA, 18920. I am a dog owner and enthusiast.

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.
- * 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 yours,

Phillip W. Hellwig
Phillip W. Hellwig

291 Barneston Road
Honey Brook, PA 19344
February 7, 2007

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

Dear Ms. Bender:

My name is Mary Ann Jones. I live in Chester County. I own several Pembroke Welsh Corgis. I show them in competitive obedience and use them as therapy dogs. I got my dogs from a small-scale breeder who spends a lot of time studying genetics. As a result, my dogs are healthy, happy, and well-behaved. As a result, I am able to do valuable work helping people in hospitals and nursing homes. This is largely because I was able to choose my breeder and choose my dogs myself and support a small-scale breeder who cares about dogs, their health and their temperaments.

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.
- * 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.

Penalizing small or hobby breeders will force more people to buy illegal dogs and feed the problem of our having uncaring large scale breeders. **If you could see the looks on the faces of the hospital patients I visit, you would ban this proposal in a heartbeat. If you could hear about how many people have bought dogs from pet shops and "farms" in Lancaster County and have behavioral problems with them, and admire my well-behaved, well-bred dogs, you would start to realize that the current proposal is aimed at the WRONG group.**

More focus is needed for this situation. Right now it looks like a political gambit to make it look like a problem is being addressed. This proposal creates a problem by blocking quality pet breeding and enabling more puppy mills to thrive.

People love dogs, people want their pets, and you know they will get them. Don't drive them into the arms of the big money, big operation breeders. This needs more thought.

Sincerely,



Mary Ann Jones

2559

Arthur Coccodrilli, Chairman
Independent Regulatory Review Commission
333 Market Street, 14th Floor
Harrisburg, PA 17101
Fax: 717-783-2664

February 7, 2007

RE: Comments on proposed Dog Law regulations

Dear Mr. Coccodrilli:

As a citizen of the state of Pennsylvania and an active animal rescuer, I 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 and I respectfully submit these comments on the proposed changes to the Dog Law regulations.

1. Contrary to what the breeding industry states, the engineering standards specified in the proposed regulations do have a scientific foundation. The standards in the proposed regulations are more akin to acceptable husbandry practices. They will bring the engineering standards up to par with those set forth in the Animal Welfare Act. The new regulations will not bring hobby breeders under the purview of the Dog Law. Only kennels that keep, harbor, board, shelter, sell, give away, or transfer a cumulative total of 26 or more dogs in one calendar year will be required to comply with the new regulations. As a result, true hobby breeders are still exempt from the law. The Dog Law and its regulations are aimed at regulating larger and commercial breeding facilities.
2. An additional exemption should be added for non-profit 501(c)3 establishments making use of a network of temporary (foster) homes. A private home functioning as a temporary home for a non-profit rescue should not be held to the same standards as a commercial breeding facility, but to the standards of private pet owners as long as those individual homes keep, harbor, board, shelter, sell, give away, or transfer a cumulative total of less than 26 dogs in one calendar year.
3. I strongly support the requirement of doubling the cage size. This change is the most important that can be made to improve the quality of life for dogs in commercial breeding facilities in Pennsylvania. This provision should remain in the regulations regardless of opposition from breeders. In fact, this section should be further strengthened by adding a provision stating that where more than one dog is housed in a primary enclosure, the primary enclosure must provide proportionally adequate space for all dogs.
4. A new section should be added to the regulations requiring that a licensee must have enough employees to carry out the level of husbandry practices and care required by the Act and its regulations. Additionally, the employees who provide for care and husbandry or handle animals should be supervised by an individual who has the knowledge, background,

INDEPENDENT REGULATORY
REVIEW COMMISSION

2007 FEB -7 PM 2:53

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6. Basics of cruelty and neglect investigations for referral to appropriate authorities;
7. Report-writing and record-keeping;
8. Overview of the legal system, court structure and terminology;
9. Basics of interpreting animal behavior;
10. Identification of injury, disease, abuse and neglect in dogs;
11. Animal hoarders; and
12. Civil liability issues.

9. A new section should be added to the regulations mandating that the Department and dog wardens coordinate and work with law enforcement when applicable. It is imperative that the department work with law enforcement to ensure that both the cruelty laws and the Dog Law are adequately enforced.

Once again, I commend the Department of Agriculture and the Bureau of Dog Law Enforcement for proposing regulations that will improve the conditions for dogs housed and bred in Pennsylvania's commercial kennels. The changes I have noted above will further ensure that such dogs are protected. Thank you for your time and consideration.

Sincerely,



Carrie DeHaven

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

RECEIVED

2007 FEB -9 AM 11:13

INDEPENDENT REGULATORY
 REVIEW COMMISSIONCOPY
 to Arthur Caccodrilli

February 5, 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. 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:

1. The penalties in § 21.4(1)(iii) for "failure of an individual to comply with licensure provisions" should be increased from \$25 to \$300 per violation to \$25 to \$300 *per day of violation*.
2. The Secretary should be mandating to file suit to enjoin operation of unlicensed kennels where the kennel is not in compliance with the standards in the regulations and is unable to qualify for a license.
3. I commend the Department of Agriculture and the Bureau of Dog Law Enforcement for doubling the required cage size. This is perhaps the most important change that can be made to improve the quality of life for dogs in commercial breeding facilities in Pennsylvania. This provision should remain in the regulations regardless of opposition from breeders. This section should be further strengthened by adding a provision stating that where more than one dog is housed in a primary enclosure, the primary enclosure must provide adequate space for all dogs. For instance, if the enclosure houses two dogs, it must provide double the cage space that would be required for a single dog. If it houses three dogs, it must provide three times the cage space, etc.
4. I also commend the Department of Agriculture and Bureau of Dog Law Enforcement for including a provision that requires the dog wardens to visually observe the physical condition of each dog. However, the provisions regarding orders of veterinary care should be strengthened to state that the owner must provide "proof of *current and proper* veterinary care for the dog." This provision should also be amended to include excessive matting and excessively long toenails as indications of lack of proper veterinary care. Inadequate grooming can lead to painful medical issues for dogs, including skin lesions from excessive matting and leg and joint injuries from failure to keep toenails appropriately trimmed. Moreover, the section should be amended to *require* dog wardens to order a

veterinary check on dogs that exhibit signs of infection, contagious disease or parasite; or that appear to be in poor health where proof of current and proper veterinary care is not provided.

5. A new subsection should be added to § 21.30 clarifying the required training for dog wardens. Training in the following areas should be added into the regulations to expand upon the requirements set forth in 3 P.S. § 459-901:

1. State laws relating to dog licensing, control and owner responsibilities;
2. State and federal laws relating to animal care, cruelty and neglect;
3. State laws relating to dangerous dogs;
4. State and federal law relating to lack of arrest powers, proper use of search, seizure and warrants;
5. State and federal laws relating to pounds and shelters;
6. Basics of cruelty and neglect investigations for referral to appropriate authorities;
7. Report-writing and record-keeping;
8. Overview of the legal system, court structure and terminology;
9. Basics of interpreting animal behavior;
10. Identification of injury, disease, abuse and neglect in dogs;
11. Animal hoarders; and
12. Civil liability issues.

6. A new section should be added to the regulations mandating that the Department and dog wardens coordinate and work with law enforcement when applicable. It is imperative that the department work with law enforcement, and specifically Humane Society police officers, to ensure that both the cruelty laws and the Dog Law are adequately enforced.

7. A new section should be added to the regulations requiring that a licensee must have enough employees to carry out the level of husbandry practices and care required by the Act and its regulations. Additionally, the employees who provide for care and husbandry or handle animals should be supervised by an individual who has the knowledge, background, and experience in proper husbandry and care of dogs to supervise others. The licensee must be certain that the supervisor and other employees can perform to such standards.

8. Stacking primary enclosures on top of one another should be prohibited. Stacking cages creates an unnatural environment for the dogs. Additionally, it makes observation of the dogs more difficult and creates sanitation problems. Even with a tray or partition between cages, it is likely that the partitions may overflow, causing feces, urine, food, water, and hair to fall onto the dogs located in the cages below.

9. The section on wire mesh flooring should be amended to make it at least as strict as the federal Animal Welfare Act, which requires that metal strand flooring be greater than one-eighth of an inch in diameter (9 gauge) or coated with a material such as plastic or fiberglass. Language should also be added requiring that all primary enclosures that have wire mesh flooring also have a resting board of sufficient size to allow each dog in the enclosure to lie in a full lateral recumbent position and be able to make normal postural adjustments. Resting boards are necessary to provide for the comfort of the dog and to allow the animal to have some time away from living on grated fencing. Providing resting boards will result in fewer foot lesions and other foot and leg injuries to the dogs. A solid resting surface that is impervious to moisture is also a more natural environment for the animal, provides a

draft-free surface and enables the dog to retain its body heat. A dog feels most vulnerable when lying down, and forcing a dog to lie over an exposed area can contribute to anxiety. Humane standards and survival standards are separate, and creating an environment that merely allows for survival does not necessarily make such an environment humane.

10. Contrary to what the breeding industry states, the engineering standards specified in the proposed regulations do have a scientific foundation. The standards in the proposed regulations are more akin to acceptable husbandry practices. They will bring the engineering standards up to par with, if not above, those set forth in the Animal Welfare Act. Contrary to the hobby breeders' contention, the new regulations will not bring hobby breeders under the purview of the Dog Law. Only kennels that keep, harbor, board, shelter, sell, give away, or transfer *a cumulative total of 26 or more dogs* in one calendar year will be required to comply with the new regulations. As a result, true hobby breeders are still exempt from the law. Good husbandry practices dictate that anyone harboring a larger number of dogs (26 or more) should comply with certain engineering standards to ensure the health, safety, and well-being of the dogs. The Dog Law and its regulations are aimed at regulating larger and commercial breeding facilities. Therefore, the new regulations will not affect hobby breeders, contrary to what the breeding community suggests.

Once again, I commend the Department of Agriculture and the Bureau of Dog Law Enforcement for proposing regulations that will improve the conditions for dogs housed and bred in Pennsylvania's commercial kennels. The changes I have noted above will further ensure that such dogs are protected. Thank you for your time and consideration.

Sincerely,



Christie Lyons
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CC: Arthur Coccodrilli, Independent Regulatory Review Commission