

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

RECEIVED

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INDEPENDENT REGULATORY
 REVIEW COMMISSION

Dear Ms. Bender,

My name is Noreen Sankovich, I am 50 years young, living with my husband of 26 years and our canine family in our Dover home since 1986. I opened my home based beauty salon in 1987 where I work, which affords me the opportunity to be "home" for our dogs. Our activities beyond work are based on everything related to our dogs, as we were unable to have children. My whole life has included a rescued dog...and from 1981, my husband and I have been rescuing dogs together. After volunteering consistently at the York County SPCA, I was invited to run for a board seat, and became a board member, one of the very few that spent time physically working with the staff and animals, allowing me the opportunity to learn first hand the woes of ignorance in pet ownership and poor breeding practice regarding dogs and cats in our area. Being as close to Lancaster County as we are in York County...many of the problem dogs were puppy mill purchases or second generation to their original poorly bred puppy mill or back yard dogs. As you are probably aware yourself... I too have seen every imaginable scenario regarding the nightmares that come from puppy mill breeding, and even greedy back yard breeders. Nothing would make me happier than to see mass production puppy mills stopped. And the pet stores that convince the public that they are selling home raised...socialized puppies with AKC papers to prove it. Prove what? Nothing, but a piece of paper stating that the dog is a pure bred, registered with a company based on profit. So, when I heard that your department was actively working on new regulations, I was elated...until I read your 68 pages of rules and regulation amendments. Let me further add...since learning what is wrong with puppy mills, during the process of adoption ourselves, we found our "breed". We fell in love with the Briard. A very rare and ancient herding breed. "March 2007 issue of AKC Gazette states that in December of 2006, there were 14 individual Briard Dogs registered with the AKC, as compared to 10 individual Briard Dogs registered in December of 2005. with only 3 Litters registered in that month for each year, as compared with Labrador Retrievers, there were 3,203 Litters registered in December of 2006 and 3,532 Litters registered in 2005...this represents 8,892 and 9,344 individual Dogs registered respectively. Perhaps this will explain why We are a part of the Keepers of the Briard Breed. As a Rare breed...we are dealing with a limited gene pool, and in order to maintain the integrity of the standard and dogs with health clearances..we have a relatively close knit Briard community. We have spent the past 7 years totally and happily wrapped up in Briards. Some of our mentors have been in Briards for over 30 years. It took intense research to find the breeders we purchased our dogs from, after extensive interviews. We have proven that we are good at what we do. We have shown them ourselves to their Championships...one of which is a three times recognized National winner....our latest win was this past Thanksgiving, when Luna represented the Briard in the National Dog Show, shown nationwide after the Thanksgiving day parade on NBC. We have only bred one litter..of 13 healthy, happy puppies..all placed in wonderful homes. We are involved in three clubs, Our National Briard Club of America, the Atlantic States Briard Club, and our local York Kennel Club. So...you can imagine my surprise when I read 68 pages of legal mumbo jumbo regarding many things that will effect our lives, not just those inhumane puppy mills that I've donated funds to fight. This has been so frustrating that we have actually reconsidered living in PA...where we have roots and a business of 20 years..and our home, that is

maintained for the safety and comfort of our dogs. So...now that you know who I am...I would like to add my thoughts regarding the proposed amendments to the PA dog law regulations issued on Dec. 16th, 2006.

I would love to see inhumane and substandard kennel conditions stopped....but not by destroying our life's purpose. We are responsible dog owners, and occasional home breeders. We have no plans to ever have 26 dogs in our home at any time....but by the regulations you have set forth, considering that we have a large breed...our litters can be any number from 1 to 15. Given this fact...we would not be allowed to plan more than one litter in a calendar year. And planning a Briard breeding is time consuming and intricate. Some breeding is planned years in advance. And then of course there is conformation to achieve, obedience, herding, health clearances and the fun things we do with our dogs. As a rare breed...we are dealing with a limited gene pool, and in order to maintain the integrity of the standard and dogs with health clearances..we have a relatively close knit Briard community. Every dog that we personally place is extensively socialized in our home...with every possible scenario introduced to each puppy...they leave here micro chipped, and up to date with required and necessary shots and vet examination. They are generally ready to sleep in a crate, are potty trained, even taught to use a doggie door. They have exposure to our adult pets, friends, family, children...and more things than are available to most children. They are not only our lives...they are our legacy. On the same subject...a breeder of say Yorkies...could have 10 litters in a year, but we would be limited to one?

As for the regulation amendments...Speaking as a home based breeder. If we were to accept these amendments as they stand...we would be forced to add on another room to our home to house kennels we have no use for. On the same hand...then each motel or hotel that exists would have to do the same...after all...people are visiting with dogs. Plus...when we go to distant dog shows..we frequent motels. We have never given reason for a hotel to not want us back, and we bring our own crates. But by your rules...the motels would have to make a facility to house our dogs. If they stop taking dogs, or even cats..then they would loose a great deal of money...because dog show people...spend a lot!! And let's consider the dog training facilities and pet stores. With all the dogs that enter pet store, and all the training that takes place there....do they have to build a few hundred or a thousand kennels, and make arrangements for a potty facility or stoned location in the parking lot, and covered too? And let's not forget all of the vet offices, and grooming shops. How about the retirement communities where we take therapy dogs? Will they have to make facilities to house dogs that are only there for a visit..and the hospitals, where children with Cancer are anxiously waiting to see their favorite furry friends....and those libraries...where dogs sit while kids read to them.....the list goes on and on and on. Specify your requirements geared toward the offenders...puppy mills. By targeting everyone, you are just making life in PA look like a prison sentence.

Onto the topic of neutered and whole dogs and bitches residing in the same location. We have both and we have never had an oops litter. We have males with females...they are a family. Asking people to house and potty separately is impossible. If that's the case, when will the public schools start separating boys

from girls? I know that emotion is something that you don't want to hear about...but the fact is that pets have a calming effect...and by your actions, you are effecting every person that owns or plans to own one. Fact is, there is no scientific or accepted husbandry basis for the amended space and exercise requirements...nor for the size and sex of the dogs.

Record keeping....requirements with respect to exercise, cleaning, and kennel management are excessively overwhelming, with no real purpose....with no way to verify accuracy. As a breeder, we are required by the AKC to keep records of breeding, and where the puppies reside. What more is needed. If I kept a record of every dogs movement..literally, I would have no time for socializing or training, or even sleeping.

Implementation: I agree that there are changes that need to be made...but that would include implementing the regulations already on the books. Changing the regulations doesn't implement them. You need manpower...a system of control in LARGE puppy mill kennels. And a way to stop puppy stores from marketing puppies. You need a way to police puppy mills. Not small home breeders that are the salvation of the healthy dogs. If you can't enforce the current regulations..how can you propose to enforce the new ones? Public education is a way to start. Advertising proper pet ownership...coloring books in schools, education classes starting while children are young, as I implemented in our local SPCA...all under public donation. I recommend you add a box on the PA taxes for each individual to check a box and pay a dollar donation to the Animal fund...where you can hire properly trained personnel that can police the regulations you have on the books as they stand. And by educating the public...we can stop the madness....not start more madness by means of placing 68 pages of amendments and changes that will effect almost every dog breeder and pet owner and pet associated worker in the state. What ever happened to our freedom of choice, and right to the pursuit of happiness? I could send you letters from puppy owners that are happier than ever, lives enriched by having one of our puppies. There is a much larger picture here to consider than just punishing innocent people by regulations that are unattainable.

Sincerely,
Noreen T. Sankovich
3635 Carlisle Road
Dover, PA 17315
717-292-6581