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Rec'd 2/20/07

1108 Fairhill Road
Sellersville PA 18960
Feb. 6, 2007

Ms Mary Bender
Bureau of Dog Law Enforcement
2301 North Cameron St
Harrisburg PA 17110-9408

Dear Ms Bender,

This is in regard to the proposed amendments to the PA Dog Law Regulations issued December 2006. I only recently became aware of these proposed rules and hope my comments on behalf of myself as a hobby breeder and active field trialer and President of the Del Val Brittany Club will be heard.

Overall I find the proposal too prescriptive – For example there are detailed engineering requirements such as 6 air changes per hour for indoor facilities, specifying the size of rock for the base layer of a gravel run, kennel run size etc. Specifically from the bulletin 36PaB.7596:

Section 21.1 - Definitions – I believe “temporary home” would affect most professional field trainers, show handlers and residential hobby breeders who may have more than 26 dogs pass thru their hands in a year. These people typically take excellent care of their client’s dogs and would find most of the new proposal costly and unnecessary.

Section 21.21 - Primary enclosures must have walls or partitions – such wall between kennels will hinder proper air flow to allow heat or cooling to reach the dog in each kennel and to facilitate drying after wash down.

Section 21.24 - Shelters - For outdoor facilities each run must be at least 5 times the length of the largest dog and 2 times as wide as the length of the largest dog. Where does this come from? I’ve owned and bred bird dogs for 30 years and have never observed them exercising themselves in their 4x10ft runs. Dogs just do not utilize large kennel runs. This requirement will cause many quality commercial kennels, reputable breeders, trainers and non- profit kennels to go out of business due to the cost of new facilities. If you must specify kennel run area this large please consider grandfathering existing facilities.

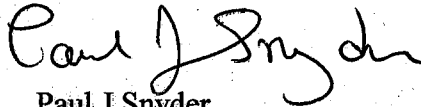
Section 21.29 – Sanitation – I can understand the sanitation requirement for concrete kennel runs. But the proposal allows for gravel or stone outdoor runs and exercise areas. I

agree these must drain properly but real sanitation of gravel is not possible. So this seems to be a conflict. I like pea gravel outdoor runs as hosing in the winter isn't needed – one scoops a little gravel with the cleanup. However I cannot recommend this surface for commercial boarding kennels.

Section 21.41 Records – the additional record keeping is onerous. Records of daily feedings, kennel cleaning, and water change, and exercise – what a task to apply even to a commercial kennel. I have no problem with records for medication, veterinary care or incidents where the dog is injured.

I fully support no toleration for inhumane conditions for dogs and believe substandard puppy mills should be addressed. But rather than issue a bible for “how a Pennsylvania dog shall be housed” may I suggest that the deficiencies that your enforcement agents have identified in the present laws be specifically addressed.

I also associate myself with the detailed comments submitted by the Pennsylvania Federation of Dog Clubs.

A handwritten signature in cursive script that reads "Paul J. Snyder".

Paul J Snyder
215-723-2219