No Name 57 Mt. View Road Rd 1 Strausstown, PA 19559

January 30, 2007

RECEIVED

2017 FEB -7 . MM 11: 16

INDEPENDENT REGULATORY REVIEW COMMISSION

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I sincerely urge that this proposal be withdrawn, as the beneficial outcome will be in question if the proposal is adopted.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

Charles Stoudt

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

RECEIVED

· 2007 FEB -7 AM 11: 15

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.

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, Edna M. Bubacker

Strawberry Lane Kennel 40 Lengle Road Myerstown, PA 17067

Oak Bend Road Kennel 34 Oak Bend Rd Newburg, PA 17240

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,

Rauben M. 3000.

RECEIVED 2007 FEB -7 MM 11: 15 INDEPENDENT REGULATORY BENEW CUMPRESSION

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

RECEIVED 2007 FEB -7 AM 11: 15 NOEPENDENT REGULATORY

REVIEW COMMISSION

January 26, 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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Yours sincerely,

Stephen Stolefin

Stephen Stoltzfus 5053 Brush Valley Road Rebersburg, PA 16827

Independent Regulatory Review Commission Attn: Arthur Coccodrilli, Chairman 333 Market Street, 14<sup>th</sup> Floor Harrisburg, PA 17101 RECEIVED 2007 FEB - 7 AM 11: 15 NOEPENDENT REGULATORY BEVIEW 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.

film. Eucho

Trachaven Kennel 6623 Blooming Grove Rd Glenville, PA 17329

Martha Newswanger RD #2, Box 185 Williamsburg, PA 16693

RECEIVED

2007 FEB -7 M II: 15

INDEPENDENT REGULATORY REVIEW COMMISSION

January 30, 2007

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

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I sincerely urge that this proposal be withdrawn, as the beneficial outcome will be in question if the proposal is adopted.

Yours truly,

Mattha New Dwanger

January 26, 2007

IRRC

Attn: Mr. John H. Jewett 14th Floor Harristown 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.

RECEIVED

2007 FEB -7 AM 11: 15

INDEPENDENT REGULATORY

REVIEW COMMISSION

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Yours truly,

Amida Mack Xache Los Kennels

Independent Regulatory Review Commission Attn: Arthur Coccodrilli, Chairman 333 Market Street, 14th Floor Harrisburg, PA 17101 RECEIVED 2007 FEB - 7 AM 11: 16 NDEPENDENT REGULATORY REVIEW COMMISSION

**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,

Johnfrestrie

JohnFirestine 925 East Clay Street Shamokin, PA 17872

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

2007 FEB -7 MM 11: 16

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I sincerely request that this proposal be withdrawn.

Yours Sincerely,

John R Fisher

JohnFisher 2816-B North Cherry Lane Ronks, PA 17572

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

**January 30, 2007** 

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Yours Sincerely,

283

AlvinFlaud 71 Rock Rd Honey Brook, PA 19344

RECEIVED 2007 FEB -7 AM 11: 15 INDEPENDENT REGULATORY REVIEW COMMISSION

January 20, 2007

Dear Chairman Coccodrilli,

RECEIVED 2007 FEB - 7 AM 11: 15

# NDEPENDENT REGULATORY

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I sincerely request that this proposal be withdrawn.

Yours Sincerely,

Dan Esh

Claer-View Kennel 68 Clearview Rd Ronks, PA 17572

RECEIVED

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

**January 30, 2007** 

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Yours Sincerely,

Patrici Jeste **Fishers Kennel** 

723 N. Lancaster St Jonestown, PA 17038

2007 FEB -7 AM 11: 15

INDEPENDENT REGULATORY

REVEN COMMISSION



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

**January 30, 2007** 

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Yours Sincerely, Elmer Fisher

ElmerFisher 100 Hartman Bridge Rd Ronks, PA 17572

# Kirik's Kennel 8832 Union-Amity Rd RECEIVED Union City, PA 16438

2007 FEB -7 AM 11: 16

January 26, 2007

INDEPENDENT REGULATORY REVIEW COMMISSION

Independent Regulatory Review Commission Attn: Arthur Coccodrilli, Chairman 333 Market Street, 14<sup>th</sup> 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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Additionally, kennels have been custom built to comply with the Department of Agricultures 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.

Rebecca BKirck of Kirik's Kennel

Sarah Ann Martin Dreisbach Church Road Lewisburg, PA 17837

January 30, 2007

RECEIVED 2007 FEB - 7 AM II: 15 INDEPENDENT REGULATORY REVIEW COMMISSION

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

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Darch ann Martin

RECEIVED 2007 FEB - 7 AM 11: 15 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 Agricultures 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 uniformkennel 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.

Jem Ainsfer Shilma Hensberger

Jim Hunsberger Rd 1 Box 154 Mt Pleasant Mills, PA 17853

January 22, 2007

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

Dear Chairman Coccodrilli,

1 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

Buddy Walk 185 Mulholton Dr. Tyrone, PA 16686



RECEIVED 2007 FEB -7 AM 11: 15 INDEPENDENT REGULATORY REVEW COMMISSION

January 31, 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 Agricultures 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.

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Yours truly,

Rockvales Kennele

Rockvale Kennels 100 Hartman Bridge Rd Ronks, PA 17572

## Mar-Jo Kennel 900 Unger Lane Boyertown, PA 19512

2007 FEB - 7 AN 11: 15

January 30, 2007

INDEPENDENT REGULATORY REVIEW COMMISSION

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

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

IRRC Attn: Mr. John H. Jewett 14<sup>th</sup> Floor Harristown 2 333 Market St. Harrisburg, PA 17101

RECEIVED

2007 FEB - 7 AM (1: 14

INDEPENDENT REGULATORY REVIEW COMMISSION

January 31, 2007

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Yours sincerely,

Meluin & zen

Zimmerman's Glenbrook Kennel 101 Glenbrook Rd Leola, PA 17540

IRRC Attn: Mr. John H. Jewett 14<sup>th</sup> Floor Harristown 2 333 Market St. Harrisburg, PA 17101

January 23, 2007.

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RECEIVED

2007 FEB -- 7 AM 11: 14

INDEPENDENT REGULATORY REVIEW COMMISSION

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 Agricultures 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.

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Johnny Z. Glick 185 Amsterdam Rd New Holland, PA 17557



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

2007 FEB -7 MM 11: 14

NDEPENDENT REGULATORY REVIEW COMMISSION

January 31, 2007

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.

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.

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

2/3/07

RECEIVED

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

2007 FEB - 7 M 11: 16

### INDEPENDENT REGULATORY REVIEW COMMISSION

Cc: Arthur Coccodrilli, Chairman of the Independent Regulatory Review Commission

Dear Ms. Bender:

I have always owned dogs and I consider them to be an important part of my family. The fact that Pennsylvania's reputation is that of "Puppy Mill Capital of the East Coast" saddens me greatly. Let's please work together to turn that horrible reputation around for the citizens of Pennsylvania, but also for those suffering who have no voice!

I am thankful to the Bureau of Dog Law for proposing new and amended kennel regulations to improve the living conditions of the dogs in commercial breeding kennels.

I fully support the proposed kennel regulations and hope for their passage.

The below listed amended regulations are of the utmost importance to me to insure ethical and humane conditions needed for "man's best friend" to have a better quality of life:

"Double the cage requirements that currently exist"

"Provide 20 min of daily exercise for each dog"

"Provide heat when temperatures drop below 50 degrees Fahrenheit, and cooling when temperatures rise above 85 degrees Fahrenheit"

"Provide better lighting and frequent air changes for ventilation"

"Remove all dogs from their cages/kennels/crates during cleaning"

"Deny kennel licenses to those people who have been convicted of animal cruelty within the past 10 years"

Additionally, it is very important to me that you consider adding the regulation of:

#### "Permanent tethering cannot be used as the primary enclosure"

Thank you for your time and consideration in this matter.

Sincerely, Patricia A. Conlon

Patricia A. Consen

#### 2/3/07

Pennsylvania Department of AgricultureBureau of Dog Law Enforcement2007 FEB - 7 AM 11: 16Attn: Ms. Mary Bender2001 North Cameron Street2301 North Cameron StreetNDEPENDENT REGULATORYHarrisburg, PA 17110-9408REVEW (COMMISSIONCo: Arthur Coccordrilli Chairman of the Independent Paculatory Paviery Commission

RECEIVED

Cc: Arthur Coccodrilli, Chairman of the Independent Regulatory Review Commission

### Dear Ms. Bender:

I have two small dogs and we consider our dogs to be an important part of our family. I speak out whenever I feel that dogs are being treated cruelly or inhumanely. The fact that Pennsylvania's reputation is that of "Puppy Mill Capital of the East Coast" saddens me greatly. Let's please work together to turn that horrible reputation around for the citizens of Pennsylvania, but also for those suffering who have no voice!

I am thankful to the Bureau of Dog Law for proposing new and amended kennel regulations to improve the living conditions of the dogs in commercial breeding kennels.

I fully support the proposed kennel regulations and hope for their passage.

The below listed amended regulations are of the utmost importance to me to insure ethical and humane conditions needed for "man's best friend" to have a better quality of life:

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"Provide better lighting and frequent air changes for ventilation"

"Remove all dogs from their cages/kennels/crates during cleaning"

"Deny kennel licenses to those people who have been convicted of animal cruelty within the past 10 years"

Additionally, it is very important to me that you consider adding the regulation of:

### "Permanent tethering cannot be used as the primary enclosure"

Thank you for your time and consideration in this matter.

Sincerely, Todd J. Feddock, DMD

January 19, 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 Agricultures 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,

Milvin B Montir

Melvin Z. Martin 850 Fivepointville Road Stevens, PA 17578

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### Anna Martin 549 Hahnstown Rd Ephrata, PA 17522

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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, whélping 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 Agricultures 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. 779

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