

DANE ST CLAIR

RECEIVED

2007 FEB 28 PM 2: 41

2559

INDEPENDENT REGULATORY
REVIEW COMMISSION

537 Hackman Rd
Lititz PA 17543
717-626-2658 home
717-490-4860 cell
thecoopersinn@aol.com

February 7, 2007

0218107

Dear Doug,

I would like to thank you once again for the time dedicated by yourself, Senator Brubaker, Jessie Smith, and Karen Scheffey on January 15th to speak to our group. We were honored that you would take the time from your busy schedules and in particular your evening, to come to my home and hear our concerns. I feel it is fair to say we were all impressed with your dedication.

My personal objective in assembling the meeting was and is to support the hobby of purebred dogs, the scope of which includes, but is not limited to: utility, therapy, hunting and gun clubs, search and rescue, agility, and others.

I have already lived the majority of years that my life will offer me. However I feel it is my duty and the duty of others to see that future generations have the same opportunity that I enjoyed in that part of my life that only the dog hobby could fulfill.

The people who attended our meeting do not profit from their dogs. In deed their hobby is costly in time, money, and effort. Samuel Evans Ewing who died in 2004 was the greatest name in wolfhounds the United States had ever seen. He once told me that he was a lawyer by occupation but his passion was wolfhounds. I would say passion is what drives all who attended our meeting.

Every breed has their passionate supporters. Those people who devote most of their free time to the betterment of their beloved breed. Those who breed do so with the intention of leaving the breed better than when they started. This is what drives the hobby of purebred dogs and AKC dog shows. It is also why these people are so important to all the breeds and all who enjoy them.

I think most agreed with the Senator's suggestion of exempting two litters per year per breeder. The number of litters per year is controllable. The number of off spring per litter is not. We would ask that this number be averaged over a three year period. The reason for this is because most litters only have a couple of show quality dogs that a breeder would keep. If they are females they wouldn't be bred till three years old. Both would be bred in the same year and if one or both would have an exceptional litter they would be bred again and for the last time. This would be more than two litters in one year but would only average one or less litters per year over four years. It would be three more years until they breed again. An average of two litters per year would cover 90% or more of all hobby breeders.

We would ask that the total number of dogs counted for a breeder include only those owned and kept on their property excluding the two exempted litters per

year. And not to include friends who visit with dogs or dogs that are co-owned by the breeder off site. Most responsible breeders co-own their pups in order to control and or eliminate future breeding of dogs they sell. If these co-owned dogs are counted it would cause some to discontinue this practice and more unjustified breeding would take place. Co-owning is an important tool breeders need to retain and use to combat puppy milling.

You may also wish to consider working with the AKC on kennel inspections. The AKC has long been recognized as a national dog welfare organization. The ACA appears to be organized so breeders could avoid the standard and inspections the AKC has put into place. The ACA has shown little or no interest in dog welfare or the potential owners of these dogs.

Putting an age limit on when the pups leave the mother and litter mates should also be considered. Eight weeks has been the minimum standard. I'm sure many are now leaving at six weeks or earlier to save money and to secure the cure factor for selling. Many of these dogs haven't seen a vet, have all their puppy shots, or have been properly socialized at these young ages. These are all potential problems for their new owners and bad publicity for Pennsylvania.

In conclusion please feel free to call or email me. This communication may be shared with Senator Brubaker, Jessie Smith, Karen Scheffey or anyone else you deem appropriate.

Thank you for all your consideration,

Sincerely,

Dane Emerson St Clair