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Warren County Humane Society
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INDEPENDENT REGULATORY
REVIEW COMMISSION

February 7, 2007

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

Dear Ms. Bender

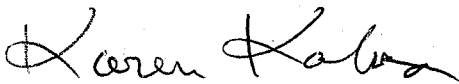
I have reviewed the preamble and recommended changes that are proposed by the Bureau of Dog Law. The Warren County Humane Society is committed to be part of any effort to make positive changes that will help facilitate our efforts in improving the standards for commercial breeding kennels. I fully support the proposed kennel regulations and welcome their passage with the following points.

Please review the following:

- I believe first and foremost that the standards for being accepted as a State Licensed Dog Kennel in Pennsylvania should be set high. **I would like to see that dogs tethered to dog houses be replaced with a requirement for a minimum** kennel size for their body size, which would allow for free movement and access to the area within the kennel. Tethers, chains, ropes and other methods used to secure dogs by the neck should be banned. If someone wishes to apply for a kennel license, they need to make a commitment to these animals by providing the highest comfort. A doghouse and chain is not quality of life for a dog.
- **The minimum number of animals needed to require a kennel license should be lowered from 26 to 10.** This is not to make more work for Dog Law Enforcement, but to deter hoarders and people who acquire more dogs than they can care for. I find in my capacity as Humane and Dog Control Officer for Warren County and Executive Director of the Warren County Humane Society that this unreasonably high number leads to many of my cruelty and neglect cases. If owners applying for a kennel license had to conform to State Regulations for a minimum of 10 dogs we could use the weight of the Dog Law to insure humane conditions be provided. This would also discourage people who hoard animals.

- I recently had a situation where I found 25 coonhounds living on a property that had been abandoned by the owners. The dogs are "visited" daily and are licensed to the caregiver's grandfather, a 70-year-old man. This allows them to purchase senior licenses for a \$2 discount. **If you license more than 5 dogs, the fee should be doubled. This would apply to all license holders.**
- **I would like to see the minimum age of 18 be required to license a dog in Pennsylvania.** Warren County has people licensing dogs in their 5 year old children's names. We use licensing to verify legal ownership, this should be taken seriously.
- **The total number of dogs located and housed at one property should be deemed as belonging to the person who owns the land, and licensed to that person.** The law is not clear on this point. We have numerous situations of more than 26 animals on a property with multiple owners. We would like to see this considered as one location and subject to the kennel regulations.
- **The dog license fee should be increased to at least \$25 for those who do not spay and neuter their pets.** This could then be used to fund education programs on dog and rabies laws in Pennsylvania. In addition, the fee could be used for a voucher program for low cost spays and neuter programs across the state, and it could fund license canvassing. A program like this would help dissuade the indiscriminate breeders.

Respectfully Yours,



Karen Kolos
Executive Director

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