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February 8, 2007  
Mary Bender  
PA Dept. of Agriculture  
Bureau of Dog Law Enforcement  
2301 N. Cameron St.  
Harrisburg PA 17110

INDEPENDENT REGULATORY  
REVIEW COMMISSION  
Gaye P. Albright-Rock  
Classy Clippe Pet Salon  
1102 Marshall Avenue  
Lancaster, PA 17601  
(717) 392-0189

Dear Ms. Bender:

I have reviewed the proposed amendments to the Dog Law Regulations, and find that there are several problems with it. I own a 27-year-old grooming shop, and these regulations will put me out of business, along with every pet groomer in PA. To enumerate:

- Groomers in PA do not have the space nor the money to comply with these regs, specifically the cage sizes and lighting/ventilation/temperature requirements. In addition, I would have to hire a person to walk each dog for 20 minutes as required.
- Groomers never have a dog overnight; most groomers do not house them for more than 8 hours -- how about a better definition of "kennel" to include a place that houses them for more/less than 8 hours?
- If the regs go through, local zoning boards will be overwhelmed with requests for new kennel licenses (by grooming salons). Especially in Lancaster County, the "puppy mill capital", I do not believe any new kennels would be approved, thus forcing groomers in PA out of business.
- Excluding grass as an exercise area is inhumane, as well as impractical. Most dogs will only eliminate on a grassy surface.
- Definitions should be stated in the regs for differences between house/grooming shop/kennel/motel/hotel/commercial breeder.

In short, none of these changes address the best interest of the dog: the unbelievable minutiae of the record-keeping requirement for kennels will mean that far less attention is paid to the actual animals, and far more to bookkeeping. I understand the spirit of what you are trying to do in regard to commercial breeders, puppy mills, and the like; however, you are ignoring the difference between "boarding kennels" and "cash crop commercial breeders".

Please consider the addition of some actual boarding kennel owners and responsible hobby breeders to your regulation formulation committee. It would be a real shame to further tie the hands of those who deeply care for animals. Thank you for your attention to this matter.

Truly yours,

  
Gaye P. Albright-Rock

Cc: IRRC