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INDEPENDENT REGULATORY
REVIEW COMMISSION

Bureau of Dog Law Enforcement
Attn: Ms. Mary Bender
Pennsylvania Dept. of Agriculture
2301 N. Cameron St.
Harrisburg, PA 17110-0408

Dear Ms. Bender:

I have been an owner, breeder and exhibitor of Saint Bernards for 30 years. I am an AKC Rally Obedience judge, a chief tester with the American Temperament Testing Society, a member of the National Association of Dog Obedience Instructors and the Association of Pet Dog Trainers. I am an evaluator for Therapy Dog International and an evaluator for the AKC Canine Good Citizen Program. I am part owner of K C Training and have been training dogs for many years. So you can see that my involvement in dogs has been long and extensive.

I feel that the rules and regulations that the Dog Law Advisory Committee is considering are not in the best interests of dogs or people.

The regulation that requires documenting how often cleaning is done can be easily falsified by some kennels. Inspectors will have too many items to check. They will be so busy checking every little item that they will overlook the big picture. Does the kennel look and smell clean? Are the dogs clean and healthy and vaccinated? Inspectors will be dealing with paper not live animals. Temple Grandin, who inspects meat packing plants for major fast food chains such as MCDonald's, deals with the issue of too much paper shuffling and not enough attention to the animals in her book ANIMALS IN TRANSLATION (p.269). Who are these inspectors going to be? Can the existing number of dog wardens handle this increase case load?

The idea that puppies should be raised in a kennel with super sanitized floors and walls is not in the best interest of the puppies. More puppies have been euthanized because of lack of socialization than have died from a lack of sanitation. Puppies need to be raised in the home because they will spend the rest of their lives in somebody's home. They need to hear the phone ring, kids laughing, the TV playing, pots, pans and dishes rattling, and the vacuum sweeper running. Above all they need to be lovingly and frequently handled by people. This can easily be done if the puppies are raised in the home.

Frequently I see this lack of socialization in puppies that enroll in my puppy kindergarten class. It takes extra effort and commitment by the owner to make up for the lack of socialization during the puppies first few weeks of life. Such famous dog trainers

as September Morn and Ian Dunbar are very much in favor of early socialization of puppies. In formulating these proposed regulations have you consulted with any noted dog trainers or behaviorists? To further emphasize my point I would like to quote from Temple Grandin's book ANIMALS IN TRANSLATION (p.321). Under the topic "Environmentally Caused Abnormal Behavior" she states: "Young puppies reared in barren kennels are more hyper and excitable compared to puppies raised with more social interaction with people."

Listen to the experts. These proposed regulations are contrary to good animal husbandry.

Sincerely,

Betty Elridge

Cc: J. Wansacz