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

RECEIVED

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INDEPENDENT REGULATORY
REVIEW COMMISSION

Dear Ms. Bender:

Hello. I own 4 Labrador retrievers that I actively train, and exhibit in a variety of venues. I am not a breeder; however I have purchased at least 3 of my dogs from Pennsylvania breeders and know many other breeders in Pennsylvania. I also advise many as a Legislative Liaison through the two American Kennel Club licensed clubs that I belong to.

I am writing you to comment on the proposed amendments to the Pennsylvania dog law regulations issued on December 16, 2006. I believe that current regulations when enforced with adequate staff and resources can do the job successfully. I agree that inhumane and substandard kennel conditions should not be tolerated, but I do not agree that most of the proposed regulatory changes are needed, or would necessarily have a beneficial outcome for everyone if adopted. Many are impractical, excessively burdensome and costly, unenforceable, and/or will not improve the quality of life for the dogs in these kennels. They will directly harm many show/field/performance hobby breeders who keep dogs in their homes as well as in temporary outdoor quarters. These breeders whelp, raise and socialize puppies in their homes. They travel to shows and trials and usually put way more money into their dogs than they get back out. They often have regular jobs outside their homes and do not employ kennel staff to write down every move a dog makes. These people are the backbone of the purebred dog fancy. If they are unfairly forced to comply with these regulations, should they be finalized in this format, they will end up giving up their hobbies and the dog buying public will be forced to turn to the commercial breeders you are trying to regulate. Also each person's situation is different. The number of dogs a person has is not always an indication of a substandard commercial breeder.

The Bureau has tacitly conceded that its current regulations have not been adequately enforced. If, after implementing its recently announced enhanced enforcement program, the Bureau finds it is still unable to prevent inhumane treatment of dogs because of specific deficiencies in the existing regulations, it should cite these specific deficiencies and propose changes based on them. The current proposal appears to be merely a laundry list of ideas for improving the environment for dogs that has no connection to specific instances in which the welfare of dogs could not be secured and no basis in science or accepted canine husbandry practices. I urge that this proposal be withdrawn. Lobbying for funding, for additional staff and training would go much farther to ensure the welfare of dogs in Pennsylvania.

Sincerely,

Gina M. Gross
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Pittsburgh, PA 15226
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