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INDEPENDENT REGULATORY
REVIEW COMMISSION

356 South Hamilton Street
Telford, PA 18969
February 9, 2007

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

Dear Ms. Bender:

My family and I live in a small town called Telford which is Northwest of Philadelphia. We own two Miniature Schnauzers named Heidi and Lady which are definitely a part of our happy family and bring much joy and excitement to our lives. I would consider myself a hobby breeder. We have bred each of our two Miniature Schnauzers and have enjoyed raising a litter of premium puppies (the sires have always been Champions) which have all found good homes with other people who love and enjoy Schnauzers.

I am writing to comment on the proposed amendments to the Pennsylvania dog law regulations issued on December 16, 2006. I believe that inhumane and substandard kennel conditions should under no circumstances be tolerated, but I do **not** agree that most of the proposed regulatory changes are needed, or would necessarily have a beneficial outcome 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.

One of the many problems with the proposed amendments to the Pennsylvania dog law regulations issued on December 16, 2006, is that smaller breeders and dog owners who maintain their dogs in their own residential premises but are covered by the Pennsylvania dog law, who provide care and conditions far superior to those required by the proposed new standards, would be unable to comply with the rigid commercial kennel standards.

Ms. Mary Bender

Page 2

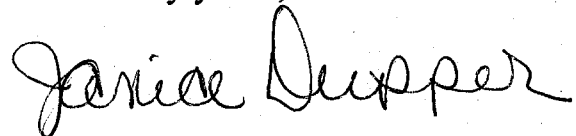
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Also, the record keeping requirements with respect to exercise, cleaning, and other aspects of kennel management are excessively burdensome and serve no useful purpose, as it would be impossible to verify their accuracy in all but the most egregious circumstances. Such egregious circumstances already violate existing regulations.

This is far from a complete list of the deficiencies with the proposed regulations. I also associate myself with the more detailed comments on this proposal by the Pennsylvania Federation of Dog Clubs.

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.

Sincerely yours,



Janice Dupper

cc: Senator Charles T. McIlhinney
Senator Stewart J. Greenleaf
Senator Robert C. Wonderling
Hon. Robert W. Godshall
Hon. Katharine M. Watson
Hon. Paul I. Clymer