

Group 49  
2-10-07

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

February 10, 2007

RE: Comments on proposed Dog Law regulations

Dear Ms. Bender,

As a concerned citizen of the state of Pennsylvania, I respectfully submit this comment on the proposed changes to the Dog Law regulations.

First, I would like to commend the Department of Agriculture and the Bureau of Dog Law Enforcement for proposing amendments to the Dog Law Regulations to improve conditions for dogs housed and bred in commercial breeding operations in Pennsylvania. **It should also be noted that the proposed changes to the regulations do not bring hobby breeders under the Act. The same people who were exempt from the former regulations (i.e. hobby breeders who raise, breed, move, sell, etc. fewer than 26 dogs per year), will continue to be exempt under the revised regulations.**

Furthermore, I fully support the comments submitted by the American Society for the Prevention of Cruelty to Animals (ASPCA) on behalf of its members, and incorporate them herein by reference. Specifically, I strongly support the following:

1. The penalties in § 21.4(1)(iii) for "failure of an individual to comply with licensure provisions" should be increased from \$25 to \$300 per violation to \$25 to \$300 *per day of violation*.
2. The Secretary should be mandating to file suit to enjoin operation of unlicensed kennels where the kennel is not in compliance with the standards in the regulations and is unable to qualify for a license.
3. I commend the Department of Agriculture and the Bureau of Dog Law Enforcement for doubling the required cage size. This is perhaps the most important change that can be made to improve the quality of life for dogs in commercial breeding facilities in Pennsylvania. This provision should remain in the regulations regardless of opposition from breeders. This section should be further strengthened by adding a provision stating that where more than one dog is housed in a primary enclosure, the primary enclosure must provide adequate space for all dogs. For instance, if the enclosure houses two dogs, it must provide double the cage space that would be required for a single dog. If it houses three dogs, it must provide three times the cage space, etc.

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5. A new subsection should be added to § 21.30 clarifying the required training for dog wardens. Training in the following areas should be added into the regulations to expand upon the requirements set forth in 3 P.S. § 459-901:

1. State laws relating to dog licensing, control and owner responsibilities;
2. State and federal laws relating to animal care, cruelty and neglect;
3. State laws relating to dangerous dogs;
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6. Basics of cruelty and neglect investigations for referral to appropriate authorities;
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6. A new section should be added to the regulations mandating that the Department and dog wardens coordinate and work with law enforcement when applicable. It is imperative that the department work with law enforcement, and specifically Humane Society police officers, to ensure that both the cruelty laws and the Dog Law are adequately enforced.

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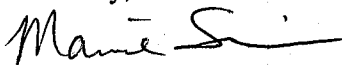
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10. Contrary to what the breeding industry states, the engineering standards specified in the proposed regulations do have a scientific foundation. The standards in the proposed regulations are more akin to acceptable husbandry practices. They will bring the engineering standards up to par with, if not above, those set forth in the Animal Welfare Act. Contrary to the hobby breeders' contention, the new regulations will not bring hobby breeders under the purview of the Dog Law. Only kennels that keep, harbor, board, shelter, sell, give away, or transfer *a cumulative total of 26 or more dogs* in one calendar year will be required to comply with the new regulations. As a result, true hobby breeders are still exempt from the law. Good husbandry practices dictate that anyone harboring a larger number of dogs (26 or more) should comply with certain engineering standards to ensure the health, safety, and well-being of the dogs. The Dog Law and its regulations are aimed at regulating larger and commercial breeding facilities. Therefore, the new regulations will not affect hobby breeders, contrary to what the breeding community suggests.

Once again, I commend the Department of Agriculture and the Bureau of Dog Law Enforcement for proposing regulations that will improve the conditions for dogs housed and bred in Pennsylvania's commercial kennels. The changes I have noted above will further ensure that such dogs are protected. Thank you for your time and consideration.

Sincerely,



Marnie Simmons

Mary Bender  
Pa. Dept of Agriculture  
2301 North Cameron St  
Harrisburg, Pa 17110

Re: Doc # 06-2452 Proposed Changes to the Dog Law

Dear Ms. Bender,

I have recently been made aware of the newly proposed Pa Dog law regulations. Yes, inhumane and substandard care and housing should definitely not be tolerated but not at the expense of responsible breeders.

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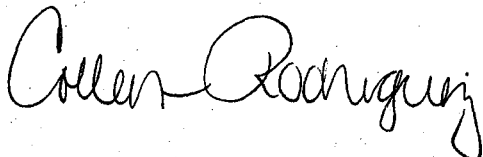
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Under the proposed changes as I read them, small scale breeders will fall into the same set of requirements as the large commercial operations. Licensed breeders with a K1 license would no longer be able to maintain, breed, whelp and raise their dogs within their homes-but this is exactly the setting from which I want to be able to buy a puppy or dog! I want a dog that was raised in a home from breeders who are careful about the health of their dogs, their temperaments and bred dogs that look like the breed they are supposed to be! These breeders would have to either stop raising dogs or build facilities to meet the commercial breeders' standards which are not the way I want a puppy I'd buy raised. The proposed regulations favor the large scale operations that will have the budget to build these "sterile" kennel facilities and hire staff to maintain the outlined record keeping requirements. Why we don't even require 20 minutes of daily mandated physical exercise for our children in schools but for dogs we do!

I want to be able to buy a dog directly from a reputable breeder, not a pet shop or large scale commercial kennel. I want to know that my puppy was raised in a loving home and exposed to a variety of household situations. I want to be able to buy a dog bred with thought to health, temperament, given lots of human contact and exposed to everyday sights and sounds. I want to be able to buy a dog that was allowed to romp in the grass and was played with by children and around other dogs. This proposal goes against the very pack nature of dogs and their need to socialize with other dogs and humans.

This effort to improve living conditions for dogs and puppies in large commercial operations/puppy mills is laudable. It is a great disservice though to Pa dog lovers and the buying public to place reputable small scale breeders under the same regulations as these large operations that most of us object to anyway. I oppose these amendments and urge that this proposal be withdrawn. Let's put some common sense thought into the dog law and target the real culprit-large scale multiple-breed puppy farms. Why not simply try really enforcing the current dog laws before wasting taxpayer money on regulations that require unenforceable record keeping & exercise standards and will hurt the very type of breeder that should be praised for the manner in which they raise their animals.

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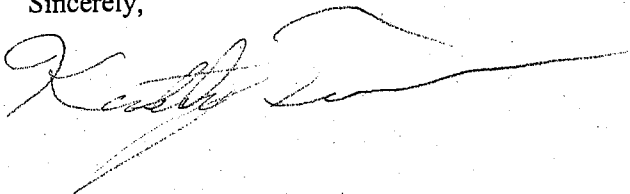
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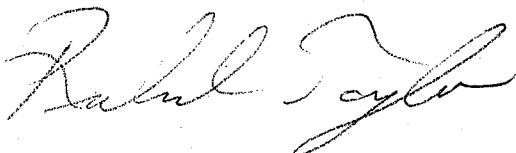
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Attn: Ms. Mary Bender  
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February 2, 2007

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

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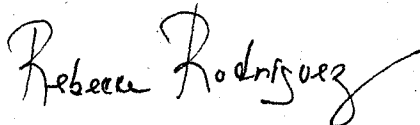
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A handwritten signature in cursive script that reads "Rebecca Rodriguez". The signature is written in dark ink and is positioned below the typed name "Rebecca Rodriguez".

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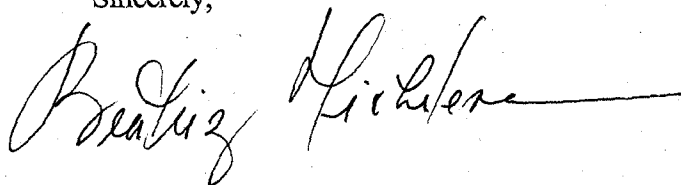
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A handwritten signature in cursive script, reading "Beatriz Lichner". The signature is written in dark ink and is positioned below the typed name "Beatriz Lichner".

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

February 2, 2007

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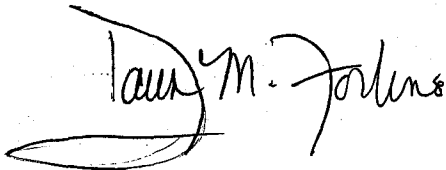
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Bureau of Dog Law Enforcement  
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*Marcella Wood* DDC

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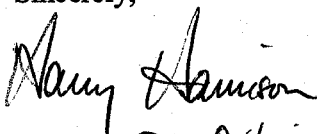
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9. The section on wire mesh flooring should be amended to make it at least as strict as the federal Animal Welfare Act, which requires that metal strand flooring be greater than one-eighth of an inch in diameter (9 gauge) or coated with a material such as plastic or fiberglass. Language should also be added requiring that all primary enclosures that have wire mesh flooring also have a resting board of sufficient size to allow each dog in the enclosure to lie in a full lateral recumbent position and be able to make normal postural adjustments. Resting boards are necessary to provide for the comfort of the dog and to allow the animal to have some time away from living on grated fencing. Providing resting boards will result in fewer foot lesions and other foot and leg injuries to the dogs. A solid resting surface that is impervious to moisture is also a more natural environment for the animal, provides a draft-free surface and enables the dog to retain its body heat. A dog feels most vulnerable when lying down, and forcing a dog to lie over an exposed area can contribute to anxiety. Humane standards and survival standards are separate, and creating an environment that merely allows for survival does not necessarily make such an environment humane.

10. Contrary to what the breeding industry states, the engineering standards specified in the proposed regulations do have a scientific foundation. The standards in the proposed regulations are more akin to acceptable husbandry practices. They will bring the engineering standards up to par with, if not above, those set forth in the Animal Welfare Act. Contrary to the hobby breeders' contention, the new regulations will not bring hobby breeders under the purview of the Dog Law. Only kennels that keep, harbor, board, shelter, sell, give away, or transfer a cumulative total of 26 or more dogs in one calendar year will be required to comply with the new regulations. As a result, true hobby breeders are still exempt from the law. Good husbandry practices dictate that anyone harboring a larger number of dogs (26 or more) should comply with certain engineering standards to ensure the health, safety, and well-being of the dogs. The Dog Law and its regulations are aimed at regulating larger and commercial breeding facilities. Therefore, the new regulations will not affect hobby breeders, contrary to what the breeding community suggests.

Once again, I commend the Department of Agriculture and the Bureau of Dog Law Enforcement for proposing regulations that will improve the conditions for dogs housed and bred in Pennsylvania's commercial kennels. The changes I have noted above will further ensure that such dogs are protected. Thank you for your time and consideration.

Sincerely,

*Alan F. McCloskey*  
*Drexel Hill, PA*

January 24, 2007

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

Dear Ms. Bender,

As a Pennsylvania breeder, I am strongly opposed to the overly restrictive rules and regulations that are proposed for kennel owners. The enforcement of regulations such as these will effectively serve to shut down or severely curtail the activities of the concerned, caring and law-abiding breeders in Pennsylvania. The extensive number of regulations outlined in this proposal and the limited time allotted prevents the proper consultation and review of these regulations with our kennel veterinarian and other professionals. Therefore, in order to allow for the proper review and consultation of this extensive proposal, I request a ninety-day extension of the comment period.

As a Pennsylvania breeder, my goal and the goal of other law-abiding breeders is to raise the best quality and healthiest puppy possible. This is not the issue. Unfortunately, the issue created by this proposal is my rights as a citizen of this state to own property, and my rights to be afforded due process guaranteed by the provisions of our state's constitution. The vagueness of this proposal causes great concern that my rights as a citizen will be omitted by the bias opinion of those who will hear my side of the story.

As a Pennsylvania breeder, I am concerned that these overly burdensome regulations will have severe unforeseen consequences. These include reduced number of breeders willing to deal with the excessive administrative burden caused by these regulations. The shortages of puppies and resulting higher prices, which will encourage the import of oversea and out of state puppies. The ensuing shortages will provide a lucrative opportunity for those who operate beneath the law to fill these shortages. Those who participate in this black market will find the rewards well worth the risk. Additionally, the economic loss to the state will be in the millions, and will go far beyond the breeder to include pet supply retailers, cities who sponsor shows, and state tax revenue.

As a Pennsylvania breeder, I believe it is unfortunate that this proposal appears to be more about animal activism than about animal welfare. You only have to consider the one section that permits shelters and other similar facilities that provide a "service" to be exempt from these regulations. I immediately question the intent behind those who are pushing the governor on this issue. What sense does it make to remove animals from a substandard facility and place them in another substandard facility? None! Furthermore, this proposal has no incentives or educational programs for the breeders. It is all threats and punishment, which is another indication, that the motives of those supporting this proposal are more interested in eliminating our industry than in improving our industry.

Sincerely,



January 24, 2007

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Sincerely,

Martin's Double E Kennel  
Edwin M Martin

January 24, 2007

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Pennsylvania Department of Agriculture  
2301 North Cameron Street  
Harrisburg, PA 17110-9408

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*David D. Mast*

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

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I believe that Camp KCS is one of the finest kennels around and it will put a HUGE burden not only on the owners of the kennels but the customers who board their dogs.

I ask that you oppose this law because if it does go into effect, our kennel will have to increase the charge for boarding and we would not be able to afford this, as I am sure many others will not and these kennels may eventually go out of business.

I am in favor of the suggested changes to the new law by Camp KCS, Inc  
Thank you for your attention in this matter.

Sincerely,

*Howard Weiner*  
Sign -----

*Howard Weiner*  
Print -----

2559

RECEIVED

Chairman of the Independent Regulatory Review Committee (IRRC):  
Arthur Coccodrilli,  
333 Market Street, 14th Floor  
Harrisburg, PA 17101  
Main Telephone: (717) 783-5417  
Fax: (717) 783-2664  
Email: [irrc@irrc.state.pa.us](mailto:irrc@irrc.state.pa.us)

2007 MAR 15 AM 8:49

INDEPENDENT REGULATORY  
REVIEW COMMISSION

1. The Dog Law regulations as applied to kennels should exempt all non-profit animal welfare and rescue organizations, especially non-kennel-based rescues and fosters. These life-saving groups are organized specifically to save and care for the dogs who are given up by their new families because of sickness and genetic disorders caused by bad breeding practices.
2. Representatives from non-profit animal welfare and rescue groups should be included on the Dog Law Advisory Board to better represent the interests of animals in forming these regulations.

Thank you for your consideration:

<u>Youshan (Y TAMILIN)</u>	<u>Eric, PA</u>
<u>Norma Johnson</u>	
<u>Arlison Felix</u>	
<u>Melinda Lynch</u>	<u>ERIC, PA</u>
<u>Clayton</u>	<u>Edinboro PA</u>
<u>Walt</u>	<u>Eric, PA</u>
<u>Shelley Robinson</u>	<u>Eric, Pa.</u>



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PLEASE!!

Thank you for your consideration:

Lori E. Vemanz  
Erie, PA

(Member - Because You Care Animal Rescue)

PAGE 1 OF 1  
ATTENTION - ARTHUR COCCODRILLI

Chairman of the Independent Regulatory Review Committee (IRRC):  
Arthur Coccodrilli,  
333 Market Street, 14th Floor  
Harrisburg, PA 17101  
Main Telephone: (717) 783-5417  
Fax: (717) 783-2664  
Email: [arthur.coccodrilli@pa.gov](mailto:arthur.coccodrilli@pa.gov)

Arthur

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Thank you

John



John Brozik  
777 W Germantown Pike Apt 229  
Plymouth Meeting, PA 19462

March 14, 2007

Chairman of the Independent Regulatory Review Committee (IRRC):

Arthur Coccodrilli,  
333 Market Street, 14th Floor  
Harrisburg, PA 17101  
Main Telephone: (717) 783-5417  
Fax: (717) 783-2664  
Email: [irrc@irrc.state.pa.us](mailto:irrc@irrc.state.pa.us)

Dear Chairman;

1. The Dog Law regulations as applied to kennels should exempt all non-profit animal welfare and rescue organizations, especially non-kennel-based rescues and fosters. These life-saving groups are organized specifically to save and care for the dogs who are given up by their new families because of sickness and genetic disorders caused by bad breeding practices.

2. Representatives from non-profit animal welfare and rescue groups should be included on the Dog Law Advisory Board to better represent the interests of animals in forming these regulations.

Thank you

*Peter Stewart*  
Erie, PA

*I volunteer with a local rescue group. I understand the problems, please don't make it harder.*

Chairman of the Independent Regulatory Review Committee (IRRC):  
Arthur Coccodrilli,  
333 Market Street, 14th Floor  
Harrisburg, PA 17101

Dear Mr. Coccodrilli:

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2. Representatives from non-profit animal welfare and rescue groups should be included on the Dog Law Advisory Board to better represent the interests of animals in forming these regulations.

Thank you for your consideration:

Natalee Hamer  
1645 W 38 St  
Erie Pa 16508

Chairman of the Independent Regulatory Review Committee (IRRC):  
Arthur Coccodrilli,  
333 Market Street, 14th Floor  
Harrisburg, PA 17101

Dear Mr. Coccodrilli:

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2. Representatives from non-profit animal welfare and rescue groups should be included on the Dog Law Advisory Board to better represent the interests of animals in forming these regulations.

Thank you for your consideration:

Pamela Davidsa  
2810 Schaper Ave  
Erie Pa 16508

Chairman of the Independent Regulatory Review Committee (IRRC):  
Arthur Coccodrilli,  
333 Market Street, 14th Floor  
Harrisburg, PA 17101

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Thank you for your consideration:

*Marsha H. Cline Pk*  
431 E. 33<sup>rd</sup> St.  
EME, PA. 16504

Chairman of the Independent Regulatory Review Committee (IRRC):  
Arthur Coccodrilli,  
333 Market Street, 14th Floor  
Harrisburg, PA 17101

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Thank you for your consideration:



DIANE M DRAKE  
3513 OAK WOOD  
ERIE PA 16508

Chairman of the Independent Regulatory Review Committee (IRRC):  
Arthur Coccodrilli,  
333 Market Street, 14th Floor  
Harrisburg, PA 17101

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Thank you for your consideration:

*Laure C Mills*

Laure C Mills  
3308 Forest Dr  
Erie, Pa 16505



Chairman of the Independent Regulatory Review Committee (IRRC):  
Arthur Coccodrilli,  
333 Market Street, 14th Floor  
Harrisburg, PA 17101

Dear Mr. Coccodrilli:

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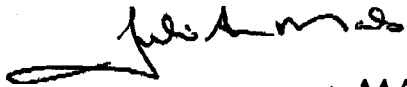
Jennifer Newell  
212 Grant St  
Cumbo Spgs, PA 16403

Chairman of the Independent Regulatory Review Committee (IRRC):  
Arthur Coccodrilli,  
333 Market Street, 14th Floor  
Harrisburg, PA 17101

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Thank you for your consideration:



JULIE ANN MADRAS  
3915 McClelland Ave  
Erie, PA 16510

Chairman of the Independent Regulatory Review Committee (IRRC):  
Arthur Coccodrilli,  
333 Market Street, 14th Floor  
Harrisburg, PA 17101

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Thank you for your consideration:

*Yvonne Daniels*  
5000 Zuck Rd  
Lancaster, PA 17303  
Lic. # 16526

Chairman of the Independent Regulatory Review Committee (IRRC):  
Arthur Coccodrilli,  
333 Market Street, 14th Floor  
Harrisburg, PA 17101

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Thank you for your consideration:

*Don J. Mendenhall*  
10200 Route 98  
Edinboro, Pa  
16412

Chairman of the Independent Regulatory Review Committee (IRRC):  
Arthur Coccodrilli,  
333 Market Street, 14th Floor  
Harrisburg, PA 17101

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Thank you for your consideration:

*Oleiv A. Menden*  
10280 Route 98  
Edwboro PA  
16812

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333 Market Street, 14th Floor  
Harrisburg, PA 17101

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Thank you for your consideration:

Vikki Cleone  
VIKKI CLEONE  
2344 E BRANDVIZO  
ERE PA 16510

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Arthur Coccodrilli,  
333 Market Street, 14th Floor  
Harrisburg, PA 17101

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Thank you for your consideration:

Linda Smith

Linda Smith  
2133 ontario Dr  
Waterford Pa  
16841

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

I. Dear Ms. Bender,

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I believe that Camp KCS is one of the finest kennels around and it will put a HUGE burden not only on the owners of the kennels but the customers who board their dogs.

I ask that you oppose this law because if it does go into effect, our kennel will have to increase the charge for boarding and we would not be able to afford this, as I am sure many others will not and these kennels may eventually go out of business.

I am in favor of the suggested changes to the new law by Camp KCS, Inc  
Thank you for your attention in this matter.

Sincerely,

Sign Wendy Murphy

Print Wendy Murphy



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

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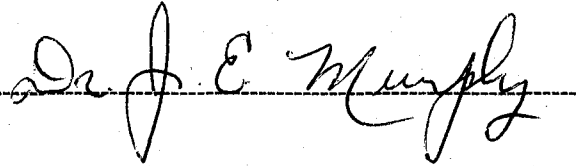
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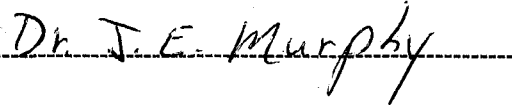
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Sincerely,

Sign

A handwritten signature in cursive script that reads "Dr. J. E. Murphy". The signature is written over a horizontal dashed line.

Print

The name "Dr. J. E. Murphy" is printed in a simple, sans-serif font over a horizontal dashed line.

Bureau of Dog Law Enforcement  
Attn: Ms. Mary Bender  
Pennsylvania Department of Agriculture  
2301 North Cameron Street  
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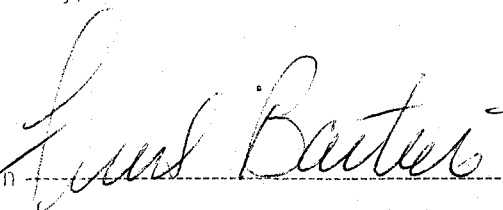
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Sincerely,

Sign

  
-----

Print

FRANK BARTON  
-----

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

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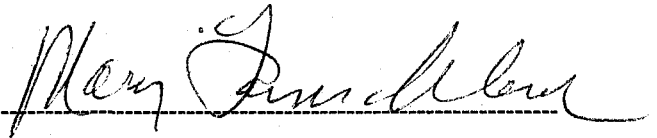
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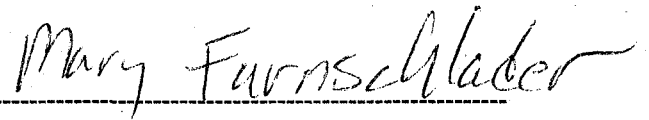
Thank you for your attention in this matter.

Sincerely,

Sign



Print



212 Main Street,  
Shartlesville, Pa. 19554  
Feb 20, 2007

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

Dear Ms. Bender,

I respectfully submit this comment on the proposed changes to the Dog Law regulations.

First, I would like to commend the Department of Agriculture and the Bureau of Dog Law Enforcement for proposing amendments to the Dog Law Regulations to improve conditions for dogs housed and bred in commercial breeding operations in Pennsylvania. It should also be noted that the proposed changes to the regulations do not bring hobby breeders under the Act. The same people who were exempt from the former regulations (i.e. hobby breeders who raise, breed, move, sell, etc. fewer than 26 dogs per year), will continue to be exempt under the revised regulations.

Karen Kinnane

*Karen Kinnane*

*Please Pass this Law!  
Protect the dogs &  
puppies of Pa. I'm tired of  
TV exposes of cruelty in Lancaster  
County!*

255 Jordan Ave.  
Monticello, Pa.  
17754  
570-368-2176

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

Dear Ms. Bender:

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 not 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.

- \* The definition of "temporary housing" would require thousands of small residential hobby and show breeding households to become licensed which could not possibly comply with the regulations, and which there is no reason to regulate.
- \* The obligations of owners of "temporary housing" which are made subject to inspection by the proposal are not enumerated or limited.
- \* There is no scientific or accepted husbandry basis for the amended space and exercise requirements.
- \* The regulations will require wholesale renovation, if not rebuilding, of many kennels already built in compliance with current federal and/or state standards. There is no scientific foundation for the arbitrary, rigid engineering standards specified.
- \* 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.
- \* 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.
- \* The proposals pertaining to housing and social interaction of dogs of different sizes are contrary to good husbandry, socialization and training practices.

The above 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,

*Jean Heller*

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

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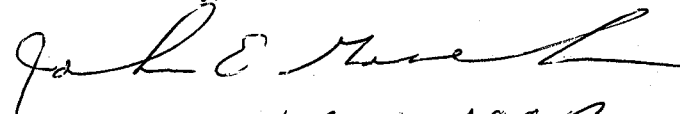
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Sincerely,

JOHN E GOOCH

  
2486 EVANWOOD RD  
BATH PA 18014

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Pennsylvania Department of Agriculture  
2301 North Cameron Street Harrisburg,  
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Sincerely,

SCOTT M. WATSON  
  
526 BAUER RD.  
BATH PA - 18014

Bureau of Dog Law Enforcement  
Attn: Ms Mary Bender  
Pennsylvania Department of Agriculture  
2301 North Cameron Street  
Harrisburg, PA 171109408

Dear Ms Bender:

I am writing to you because I am concerned with the proposed amendments to the Pennsylvania Dog Law Regulations issued on December 16, 2006. I believe that proper regulation of kennels is necessary but I question the extent to which these laws go.

As a pet owner who uses boarding kennels I question the effects of this law on the current boarding kennels. How many kennels currently in business meet the requirements as listed? Would these new laws force the closure of smaller boarding facilities and a dramatic increase in the price of boarding my pets as other facilities spend a lot of money to meet the new building specifications? Would it also make it more difficult to find a boarding kennel if these new regulations force existing kennels to close?

Section 21.23 imposes extreme requirements as to space, exercising and record keeping..

The intense record keeping required here and in other parts of the act make it almost a full time job keeping up the paperwork. Wouldn't these requirements increase the need for personnel at a boarding facility, thereby increasing my costs? Is it really necessary to keep detailed accounts of every time a water dish is changed? Surely better use can be made of kennel personnel's time.

Section 21.23 also says that dogs of different size can not be exercised together. Currently if I have two dogs who live together they can be placed in the same run when boarded, if these two dogs are of different sizes this will no longer be possible. This will increase my expense as discounts are usually given if two dogs are boarded in the same run. If my dogs live together in my home why shouldn't they be allowed to be together when boarded? I would prefer they have the security of being together when separated from me.

Under the proposed regulations pets who are boarded but of different size would not even be able to play together at the Kennel. Animals that live together in my home all the time and are comfortable together should be able to interact together if it is necessary to board them.

Section 21.28 says food receptacles cannot be made of materials that a dog can destroy. This precludes a kennel from using disposable paper containers to feed dogs. What could be more sanitary than containers which are not reused? The time spent cleaning metal food dishes is time staff can't use doing other things. The kennel where I now board uses paper for feeding boarders. I am very pleased with this.

I ask that these recommendations not be accepted and that the board seek the opinions of those who are actively involved in breeding and caring for dogs. How many people from such backgrounds were involved in the creation of these changes?

I urge the withdrawal of the current proposal and an open dialogue with the groups in the state that are actively involved in the breeding and care of dogs prior to any new proposals being introduced.

Sincerely,

*Mary Gorman*

*1402 Center St  
Harrisburg, PA 17104*

*1-2-06*



February 6, 2007

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

Dear Ms. Bender:

I am writing to you in reference to the new legislation being proposed by lawmakers in PA in an effort to improve the living conditions of animals that live in commercial breeding facilities. I would like to applaud your efforts and thank you for your work on behalf of those who have no voice.

I am writing to enthusiastically support this legislation. It is my hope that legislators will not bend to the special interests of groups who are allowing their collective financial self-interest to supercede the overall welfare of the dogs that live in these commercial breeding facilities. As you are well aware, many of these dogs spend *years* living in cramped cages with little or no medical care, no good nutrition, no socialization and no opportunity for regular exercise. It is unfortunate indeed that some turn a blind eye to the suffering of these helpless animals. I fully realize that these are the facilities that this legislation is intended to regulate more effectively.

Once again, I applaud your efforts on behalf of the helpless animals that are suffering in the state of PA at this very moment due to the greed of certain individuals. I hope that you will work tirelessly to see to it that this legislation can be passed and become law. It is my hope that the final legislation will not interfere with the work of shelters and rescues who are already working tirelessly on behalf of animals. That being said, I would like to once again express my support of this legislation.

Most sincerely,

*Karen Harter*  
*Little Falls, NJ 07424*

278 Mather Road  
Jenkintown, PA 19046  
215.884.9584

February 5, 2007

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

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Most sincerely,



Elizabeth Pope

February 5, 2007

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Department of Agriculture  
Bureau of Dog Law Enforcement  
2301 North Cameron Street  
Harrisburg, PA 17110-9408

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Most sincerely,

Mr. Wayne Clifton  
301 Fairfield Creek  
Johnstown Pa  
15106

February 5, 2007

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Department of Agriculture  
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2301 North Cameron Street  
Harrisburg, PA 17110-9408

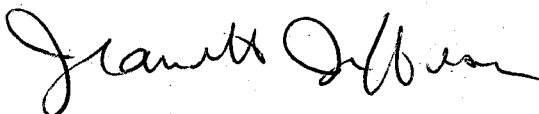
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Most sincerely,

  
JEANETTE JEFFERSON  
BATH, PA.

February 5, 2007

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Most sincerely,



Patrick Marino  
9423 Lansford St.  
Phila, PA 19114

February 9, 2007

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

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Most sincerely,

*Raya M. Regenthal*

February 5, 2007

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Most sincerely,

*Mr. Westly Buckhart*  
*1231 Penna Ave*  
*Johnstown Pa*  
*15904*

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Most sincerely,

*Serena Falls*  
*1233 Penna Ave*  
*Johnstown Pa*  
*15906*



February 5, 2007

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Department of Agriculture  
Bureau of Dog Law Enforcement  
2301 North Cameron Street  
Harrisburg, PA 17110-9408

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Most sincerely,

Christine P. Holt  
( 9423 Lansford St.  
Phila., PA 19114 )

February 5, 2007

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Bureau of Dog Law Enforcement  
2301 North Cameron Street  
Harrisburg, PA 17110-9408

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Most sincerely,

*John R. Powell*

Recently I kept a dog overnight who had come from such a facility, and had lived her entire six years in a cage. She had never seen rain, fallen leaves or grass. After much work my foster mom has gotten her over her fear of outside and she was successfully placed for adoption. How much better if she had not had to spend six years

February 9, 2007

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Department of Agriculture  
Bureau of Dog Law Enforcement  
2301 North Cameron Street  
Harrisburg, PA 17110-9408

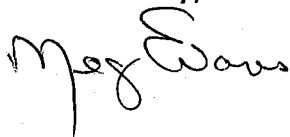
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Most sincerely,

A handwritten signature in cursive script that reads "Meg Evans".

February 5, 2007

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Department of Agriculture  
Bureau of Dog Law Enforcement  
2301 North Cameron Street  
Harrisburg, PA 17110-9408

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Most sincerely,

*Kenneth Smeal*  
86 K. St  
Johnstown Pa  
15906

*Good Luck*

February 5, 2007

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Most sincerely,

Andrea Spiegel

February 5, 2007

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Harrisburg, PA 17110-9408

Dear Ms. Bender:

I am writing to you in reference to the new legislation being proposed by lawmakers in PA in an effort to improve the living conditions of animals that live in commercial breeding facilities. I would like to applaud your efforts and thank you for your work on behalf of those who have no voice.

I am writing to enthusiastically support this legislation. It is my hope that legislators will not bend to the special interests of groups who are allowing their collective financial self-interest to supercede the overall welfare of the dogs that live in these commercial breeding facilities. As you are well aware, many of these dogs spend *years* living in cramped cages with little or no medical care, no good nutrition, no socialization and no opportunity for regular exercise. It is unfortunate indeed that some turn a blind eye to the suffering of these helpless animals. I fully realize that these are the facilities that this legislation is intended to regulate more effectively.

Once again, I applaud your efforts on behalf of the helpless animals that are suffering in the state of PA at this very moment due to the greed of certain individuals. I hope that you will work tirelessly to see to it that this legislation can be passed and become law. It is my hope that the final legislation will not interfere with the work of shelters and rescues who are already working tirelessly on behalf of animals. That being said, I would like to once again express my support of this legislation.

Most sincerely,

*Lisa Bustos*

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

Dear Ms. Bender,

I am writing this letter to inform you that I am against the new dog law proposal. I believe 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 if adopted.

I believe that Camp KCS is one of the finest kennels around and it will put a HUGE burden not only on the owners of the kennels but the customers who board their dogs.

I ask that you oppose this law because if it does go into effect, our kennel will have to increase the charge for boarding and we would not be able to afford this, as I am sure many others will not and these kennels may eventually go out of business.

Thank you for your attention in this matter.

Sincerely,

*C. B. Wisniewski*  
PO Box 467  
Pocono Pines, PA 18350

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

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Sincerely,

*Robert Wisniewski*

PO BOX 67  
POCONO PINES, PA 18350



*Ms. Bender*

Bureau of Dog Law Enforcement  
Attn: Ms. Mary Bender  
Pennsylvania Department of  
Agriculture  
2301 North Cameron Street  
Harrisburg, PA 17110-9408  
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Thank you for your attention in this matter.

Sincerely,

*Robert J. Carter*

610-5350

**ATTN: MRS. BENDER:**

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

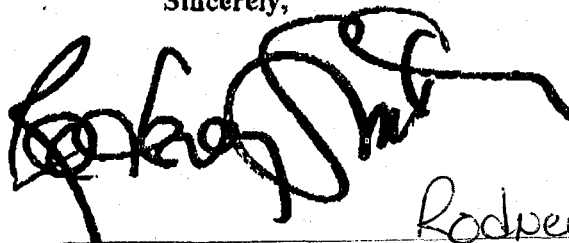
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Sincerely,

A handwritten signature in black ink, appearing to read "Rodney Smith". The signature is written in a cursive, somewhat stylized script.

Rodney Smith

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

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Thank you for your attention in this matter.

Sincerely,

Sign



Print

Brandy Gaskins

Margaret & David Leo  
934 Tennyson Circle  
PO Box 1484  
Albrightsville, PA 18210  
570-606-3233

February 15, 2007

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

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Sincerely,

Sign Margaret Leo  
Print Margaret Leo

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

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I am in favor of the suggested changes to the new law by Camp KCS, Inc  
Thank you for your attention in this matter.

Sincerely,

Sign

*Marcy E Dianno*

Print

*Marcy E Dianno*

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

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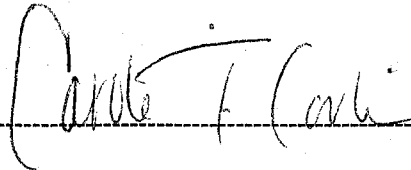
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Thank you for your attention in this matter.

Sincerely,

Sign



Print

Carole T. Corbin

**Bureau of Dog Law Enforcement** Attn: Ms. Mary Bender  
**Pennsylvania Department of Agriculture**  
2301 North Cameron Street Harrisburg, PA 17110-9408  
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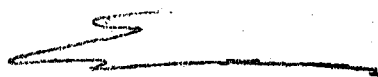
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Thank you for your attention in this matter.

Sincerely,



Eric O. Hanna

2/14/07

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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 Dear Ms. Bender,

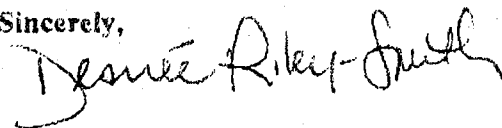
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Thank you for your attention in this matter.

Sincerely,







Mr. Donald Hepler  
2861 Meadow St  
Natrona Hts PA 15065

3-12-07

Dear May

As you know many people view Pa. as the  
"puppy mill capital of the East", please do your best to  
change this. God love those precious little puppies,  
they are wonderful. Please help to improve the outdated  
bennel regulations used to inspect the breeding operation in Pa.  
What a shame to treat those puppies as they are  
treated now, please help.

Thank you ever so much

Don Hepler

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

February 2, 2007

RE: Comments on proposed Dog Law regulations

Dear Ms. Bender,

As a concerned citizen of the state of Pennsylvania, I respectfully submit this comment on the proposed changes to the Dog Law regulations.

First, I would like to commend the Department of Agriculture and the Bureau of Dog Law Enforcement for proposing amendments to the Dog Law Regulations to improve conditions for dogs housed and bred in commercial breeding operations in Pennsylvania. **It should also be noted that the proposed changes to the regulations do not bring hobby breeders under the Act. The same people who were exempt from the former regulations (i.e. hobby breeders who raise, breed, move, sell, etc. fewer than 26 dogs per year), will continue to be exempt under the revised regulations.**

Furthermore, I fully support the comments submitted by the American Society for the Prevention of Cruelty to Animals (ASPCA) on behalf of its members, and incorporate them herein by reference. Specifically, I strongly support the following:

1. The penalties in § 21.4(1)(iii) for "failure of an individual to comply with licensure provisions" should be increased from \$25 to \$300 per violation to \$25 to \$300 *per day of violation*.
2. The Secretary should be mandating to file suit to enjoin operation of unlicensed kennels where the kennel is not in compliance with the standards in the regulations and is unable to qualify for a license.
3. I commend the Department of Agriculture and the Bureau of Dog Law Enforcement for doubling the required cage size. This is perhaps the most important change that can be made to improve the quality of life for dogs in commercial breeding facilities in Pennsylvania. This provision should remain in the regulations regardless of opposition from breeders. This section should be further strengthened by adding a provision stating that where more than one dog is housed in a primary enclosure, the primary enclosure must provide adequate space for all dogs. For instance, if the enclosure houses two dogs, it must provide double the cage space that would be required for a single dog. If it houses three dogs, it must provide three times the cage space, etc.

4. I also commend the Department of Agriculture and Bureau of Dog Law Enforcement for including a provision that requires the dog wardens to visually observe the physical condition of each dog. However, the provisions regarding orders of veterinary care should be strengthened to state that the owner must provide "proof of *current and proper* veterinary care for the dog." This provision should also be amended to include excessive matting and excessively long toenails as indications of lack of proper veterinary care. Inadequate grooming can lead to painful medical issues for dogs, including skin lesions from excessive matting and leg and joint injuries from failure to keep toenails appropriately trimmed. Moreover, the section should be amended to *require* dog wardens to order a veterinary check on dogs that exhibit signs of infection, contagious disease or parasite; or that appear to be in poor health where proof of current and proper veterinary care is not provided.

5. A new subsection should be added to § 21.30 clarifying the required training for dog wardens. Training in the following areas should be added into the regulations to expand upon the requirements set forth in 3 P.S. § 459-901:

1. State laws relating to dog licensing, control and owner responsibilities;
2. State and federal laws relating to animal care, cruelty and neglect;
3. State laws relating to dangerous dogs;
4. State and federal law relating to lack of arrest powers, proper use of search, seizure and warrants;
5. State and federal laws relating to pounds and shelters;
6. Basics of cruelty and neglect investigations for referral to appropriate authorities;
7. Report-writing and record-keeping;
8. Overview of the legal system, court structure and terminology;
9. Basics of interpreting animal behavior;
10. Identification of injury, disease, abuse and neglect in dogs;
11. Animal hoarders; and
12. Civil liability issues.

6. A new section should be added to the regulations mandating that the Department and dog wardens coordinate and work with law enforcement when applicable. It is imperative that the department work with law enforcement, and specifically Humane Society police officers, to ensure that both the cruelty laws and the Dog Law are adequately enforced.

7. A new section should be added to the regulations requiring that a licensee must have enough employees to carry out the level of husbandry practices and care required by the Act and its regulations. Additionally, the employees who provide for care and husbandry or handle animals should be supervised by an individual who has the knowledge, background, and experience in proper husbandry and care of dogs to supervise others. The licensee must be certain that the supervisor and other employees can perform to such standards.

8. Stacking primary enclosures on top of one another should be prohibited. Stacking cages creates an unnatural environment for the dogs. Additionally, it makes observation of the dogs more difficult and creates sanitation problems. Even with a tray or partition between cages, it is likely that the partitions may overflow, causing feces, urine, food, water, and hair to fall onto the dogs located in the cages below.

9. The section on wire mesh flooring should be amended to make it at least as strict as the federal Animal Welfare Act, which requires that metal strand flooring be greater than one-eighth of an inch in diameter (9 gauge) or coated with a material such as plastic or fiberglass. Language should also be added requiring that all primary enclosures that have wire mesh flooring also have a resting board of sufficient size to allow each dog in the enclosure to lie in a full lateral recumbent position and be able to make normal postural adjustments. Resting boards are necessary to provide for the comfort of the dog and to allow the animal to have some time away from living on grated fencing. Providing resting boards will result in fewer foot lesions and other foot and leg injuries to the dogs. A solid resting surface that is impervious to moisture is also a more natural environment for the animal, provides a draft-free surface and enables the dog to retain its body heat. A dog feels most vulnerable when lying down, and forcing a dog to lie over an exposed area can contribute to anxiety. Humane standards and survival standards are separate, and creating an environment that merely allows for survival does not necessarily make such an environment humane.

10. Contrary to what the breeding industry states, the engineering standards specified in the proposed regulations do have a scientific foundation. The standards in the proposed regulations are more akin to acceptable husbandry practices. They will bring the engineering standards up to par with, if not above, those set forth in the Animal Welfare Act. Contrary to the hobby breeders' contention, the new regulations will not bring hobby breeders under the purview of the Dog Law. Only kennels that keep, harbor, board, shelter, sell, give away, or transfer a cumulative total of 26 or more dogs in one calendar year will be required to comply with the new regulations. As a result, true hobby breeders are still exempt from the law. Good husbandry practices dictate that anyone harboring a larger number of dogs (26 or more) should comply with certain engineering standards to ensure the health, safety, and well-being of the dogs. The Dog Law and its regulations are aimed at regulating larger and commercial breeding facilities. Therefore, the new regulations will not affect hobby breeders, contrary to what the breeding community suggests.

Once again, I commend the Department of Agriculture and the Bureau of Dog Law Enforcement for proposing regulations that will improve the conditions for dogs housed and bred in Pennsylvania's commercial kennels. The changes I have noted above will further ensure that such dogs are protected. Thank you for your time and consideration.

Sincerely,

Chavon Parola  
3040 Hemlock Rd  
Stroudsburg, PA. 18360

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

February 2, 2007

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Sincerely,

Kimberly A. Lisacek

2343 So. Bancroft St.

Phila., Pa 19145

Ph 215-271-1506



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

February 2, 2007

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Sincerely,

Mr. & Mrs. Charles Tucker  
900 Summit Lane  
Oreland, Pa. 19075

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

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Marina J Petrach

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

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108 Centralia Ave.  
Wilmerding, PA. 15148

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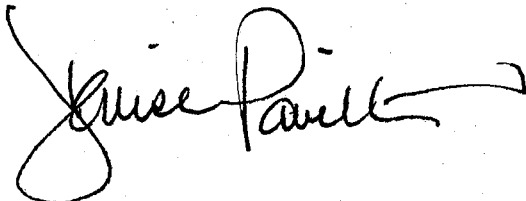
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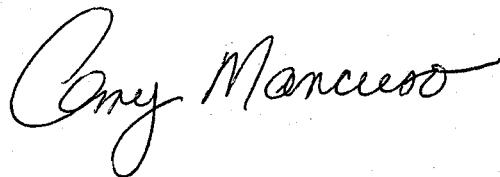
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Sincerely,

A handwritten signature in cursive script that reads "Amy Mancuso". The signature is written in black ink and is positioned below the typed name.



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

February 2, 2007

RE: Comments on proposed Dog Law regulations

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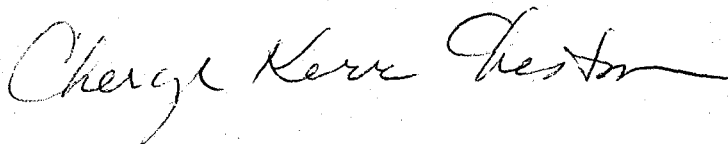
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Pennsylvania Department of Agriculture  
Attn: Ms. Mary Bender  
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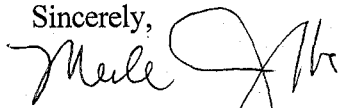
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717 S. American St.  
Phila PA 19147

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

February 7, 2007

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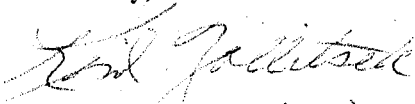
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Bureau of Dog Law Enforcement  
Pennsylvania Department of Agriculture  
Attn: Ms. Mary Bender  
2301 North Cameron Street  
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February 2, 2007

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Robert Paravacchia  
Anna Marie Paravacchia

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Pennsylvania Department of Agriculture  
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Once again, I commend the Department of Agriculture and the Bureau of Dog Law Enforcement for proposing regulations that will improve the conditions for dogs housed and bred in Pennsylvania's commercial kennels. The changes I have noted above will further ensure that such dogs are protected. Thank you for your time and consideration.

Sincerely,

Robert Paravecchia  
Anna Marie Paravecchia

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

February 2, 2007

RE: Comments on proposed Dog Law regulations

Dear Ms. Bender,

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First, I would like to commend the Department of Agriculture and the Bureau of Dog Law Enforcement for proposing amendments to the Dog Law Regulations to improve conditions for dogs housed and bred in commercial breeding operations in Pennsylvania. **It should also be noted that the proposed changes to the regulations do not bring hobby breeders under the Act. The same people who were exempt from the former regulations (i.e. hobby breeders who raise, breed, move, sell, etc. fewer than 26 dogs per year), will continue to be exempt under the revised regulations.**

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6. A new section should be added to the regulations mandating that the Department and dog wardens coordinate and work with law enforcement when applicable. It is imperative that the department work with law enforcement, and specifically Humane Society police officers, to ensure that both the cruelty laws and the Dog Law are adequately enforced.

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Sincerely,

*Julia A. Inatrix*



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

February 2, 2007

RE: Comments on proposed Dog Law regulations

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Sincerely,

Margaret A. Nichols

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

February 13, 2007

RE: Comments on proposed Dog Law regulations

Dear Ms. Bender,

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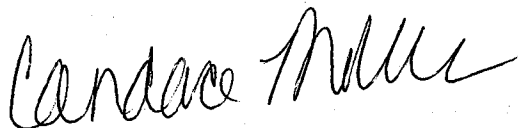
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Sincerely,

A handwritten signature in cursive script that reads "Candace Miller". The signature is written in dark ink and is positioned to the right of the word "Sincerely,".

January 24, 2007

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

Dear Ms. Bender,

As a Pennsylvania breeder, I am strongly opposed to the overly restrictive rules and regulations that are proposed for kennel owners. The enforcement of regulations such as these will effectively serve to shut down or severely curtail the activities of the concerned, caring and law-abiding breeders in Pennsylvania. The extensive number of regulations outlined in this proposal and the limited time allotted prevents the proper consultation and review of these regulations with our kennel veterinarian and other professionals. Therefore, in order to allow for the proper review and consultation of this extensive proposal, I request a ninety-day extension of the comment period.

As a Pennsylvania breeder, my goal and the goal of other law-abiding breeders is to raise the best quality and healthiest puppy possible. This is not the issue. Unfortunately, the issue created by this proposal is my rights as a citizen of this state to own property, and my rights to be afforded due process guaranteed by the provisions of our state's constitution. The vagueness of this proposal causes great concern that my rights as a citizen will be omitted by the bias opinion of those who will hear my side of the story.

As a Pennsylvania breeder, I am concerned that these overly burdensome regulations will have severe unforeseen consequences. These include reduced number of breeders willing to deal with the excessive administrative burden caused by these regulations. The shortages of puppies and resulting higher prices, which will encourage the import of oversea and out of state puppies. The ensuing shortages will provide a lucrative opportunity for those who operate beneath the law to fill these shortages. Those who participate in this black market will find the rewards well worth the risk. Additionally, the economic loss to the state will be in the millions, and will go far beyond the breeder to include pet supply retailers, cities who sponsor shows, and state tax revenue.

As a Pennsylvania breeder, I believe it is unfortunate that this proposal appears to be more about animal activism than about animal welfare. You only have to consider the one section that permits shelters and other similar facilities that provide a "service" to be exempt from these regulations. I immediately question the intent behind those who are pushing the governor on this issue. What sense does it make to remove animals from a substandard facility and place them in another substandard facility? None! Furthermore, this proposal has no incentives or educational programs for the breeders. It is all threats and punishment, which is another indication, that the motives of those supporting this proposal are more interested in eliminating our industry than in improving our industry.

Sincerely,

*Aaron Binsticker*

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

February 2, 2007

RE: Comments on proposed Dog Law regulations

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Attn: Ms. Mary Bender  
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February 2, 2007

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A handwritten signature in cursive script that reads "Judith S. Kozlowski". The signature is written in dark ink and is positioned below the typed name "Judith S. Kozlowski".

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Attn: Ms. Mary Bender  
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Frances P. Bojarski (Ms.)

PO Box 26

Willow Grove PA 19090

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4. State and federal law relating to lack of arrest powers, proper use of search, seizure and warrants;
5. State and federal laws relating to pounds and shelters;
6. Basics of cruelty and neglect investigations for referral to appropriate authorities;
7. Report-writing and record-keeping;
8. Overview of the legal system, court structure and terminology;
9. Basics of interpreting animal behavior;
10. Identification of injury, disease, abuse and neglect in dogs;
11. Animal hoarders; and
12. Civil liability issues.

6. A new section should be added to the regulations mandating that the Department and dog wardens coordinate and work with law enforcement when applicable. It is imperative that the department work with law enforcement, and specifically Humane Society police officers, to ensure that both the cruelty laws and the Dog Law are adequately enforced.

7. A new section should be added to the regulations requiring that a licensee must have enough employees to carry out the level of husbandry practices and care required by the Act and its regulations. Additionally, the employees who provide for care and husbandry or handle animals should be supervised by an individual who has the knowledge, background, and experience in proper husbandry and care of dogs to supervise others. The licensee must be certain that the supervisor and other employees can perform to such standards.



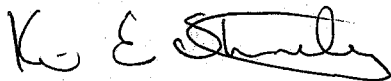
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9. The section on wire mesh flooring should be amended to make it at least as strict as the federal Animal Welfare Act, which requires that metal strand flooring be greater than one-eighth of an inch in diameter (9 gauge) or coated with a material such as plastic or fiberglass. Language should also be added requiring that all primary enclosures that have wire mesh flooring also have a resting board of sufficient size to allow each dog in the enclosure to lie in a full lateral recumbent position and be able to make normal postural adjustments. Resting boards are necessary to provide for the comfort of the dog and to allow the animal to have some time away from living on grated fencing. Providing resting boards will result in fewer foot lesions and other foot and leg injuries to the dogs. A solid resting surface that is impervious to moisture is also a more natural environment for the animal, provides a draft-free surface and enables the dog to retain its body heat. A dog feels most vulnerable when lying down, and forcing a dog to lie over an exposed area can contribute to anxiety. Humane standards and survival standards are separate, and creating an environment that merely allows for survival does not necessarily make such an environment humane.

10. Contrary to what the breeding industry states, the engineering standards specified in the proposed regulations do have a scientific foundation. The standards in the proposed regulations are more akin to acceptable husbandry practices. They will bring the engineering standards up to par with, if not above, those set forth in the Animal Welfare Act. Contrary to the hobby breeders' contention, the new regulations will not bring hobby breeders under the purview of the Dog Law. Only kennels that keep, harbor, board, shelter, sell, give away, or transfer a cumulative total of 26 or more dogs in one calendar year will be required to comply with the new regulations. As a result, true hobby breeders are still exempt from the law. Good husbandry practices dictate that anyone harboring a larger number of dogs (26 or more) should comply with certain engineering standards to ensure the health, safety, and well-being of the dogs. The Dog Law and its regulations are aimed at regulating larger and commercial breeding facilities. Therefore, the new regulations will not affect hobby breeders, contrary to what the breeding community suggests.

Once again, I commend the Department of Agriculture and the Bureau of Dog Law Enforcement for proposing regulations that will improve the conditions for dogs housed and bred in Pennsylvania's commercial kennels. The changes I have noted above will further ensure that such dogs are protected. Thank you for your time and consideration.

Sincerely,



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

February 13, 2007

RE: Comments on proposed Dog Law regulations

Dear Ms. Bender,

I respectfully submit this comment on the proposed changes to the Dog Law regulations.

First, I would like to commend the Department of Agriculture and the Bureau of Dog Law Enforcement for proposing amendments to the Dog Law Regulations to improve conditions for dogs housed and bred in commercial breeding operations in Pennsylvania. **It should also be noted that the proposed changes to the regulations do not bring hobby breeders under the Act. The same people who were exempt from the former regulations (i.e. hobby breeders who raise, breed, move, sell, etc. fewer than 26 dogs per year), will continue to be exempt under the revised regulations.**

Furthermore, I fully support the comments submitted by the American Society for the Prevention of Cruelty to Animals (ASPCA) on behalf of its members, and incorporate them herein by reference. Specifically, I strongly support the following:

1. The penalties in § 21.4(1)(iii) for "failure of an individual to comply with licensure provisions" should be increased from \$25 to \$300 per violation to \$25 to \$300 *per day of violation*.
2. The Secretary should be mandating to file suit to enjoin operation of unlicensed kennels where the kennel is not in compliance with the standards in the regulations and is unable to qualify for a license.
3. I commend the Department of Agriculture and the Bureau of Dog Law Enforcement for doubling the required cage size. This is perhaps the most important change that can be made to improve the quality of life for dogs in commercial breeding facilities in Pennsylvania. This provision should remain in the regulations regardless of opposition from breeders. This section should be further strengthened by adding a provision stating that where more than one dog is housed in a primary enclosure, the primary enclosure must provide adequate space for all dogs. For instance, if the enclosure houses two dogs, it must provide double the cage space that would be required for a single dog. If it houses three dogs, it must provide three times the cage space, etc.
4. I also commend the Department of Agriculture and Bureau of Dog Law Enforcement for including a provision that requires the dog wardens to visually observe the physical condition

of each dog. However, the provisions regarding orders of veterinary care should be strengthened to state that the owner must provide "proof of *current and proper* veterinary care for the dog." This provision should also be amended to include excessive matting and excessively long toenails as indications of lack of proper veterinary care. Inadequate grooming can lead to painful medical issues for dogs, including skin lesions from excessive matting and leg and joint injuries from failure to keep toenails appropriately trimmed. Moreover, the section should be amended to *require* dog wardens to order a veterinary check on dogs that exhibit signs of infection, contagious disease or parasite; or that appear to be in poor health where proof of current and proper veterinary care is not provided.

5. A new subsection should be added to § 21.30 clarifying the required training for dog wardens. Training in the following areas should be added into the regulations to expand upon the requirements set forth in 3 P.S. § 459-901:

1. State laws relating to dog licensing, control and owner responsibilities;
2. State and federal laws relating to animal care, cruelty and neglect;
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11. Animal hoarders; and
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6. A new section should be added to the regulations mandating that the Department and dog wardens coordinate and work with law enforcement when applicable. It is imperative that the department work with law enforcement, and specifically Humane Society police officers, to ensure that both the cruelty laws and the Dog Law are adequately enforced.

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more difficult and creates sanitation problems. Even with a tray or partition between cages, it is likely that the partitions may overflow, causing feces, urine, food, water, and hair to fall onto the dogs located in the cages below.

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Sincerely,

Paul Breslin  
7 Stonebridge Rd.  
Hampton N.S. 08827

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

February 2, 2007

RE: Comments on proposed Dog Law regulations

Dear Ms. Bender,

As a concerned citizen of the state of Pennsylvania, I respectfully submit this comment on the proposed changes to the Dog Law regulations.

First, I would like to commend the Department of Agriculture and the Bureau of Dog Law Enforcement for proposing amendments to the Dog Law Regulations to improve conditions for dogs housed and bred in commercial breeding operations in Pennsylvania. **It should also be noted that the proposed changes to the regulations do not bring hobby breeders under the Act. The same people who were exempt from the former regulations (i.e. hobby breeders who raise, breed, move, sell, etc. fewer than 26 dogs per year), will continue to be exempt under the revised regulations.**

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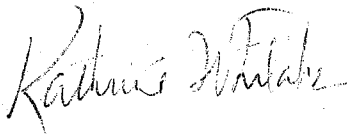
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Once again, I commend the Department of Agriculture and the Bureau of Dog Law Enforcement for proposing regulations that will improve the conditions for dogs housed and bred in Pennsylvania's commercial kennels. The changes I have noted above will further ensure that such dogs are protected. Thank you for your time and consideration.

Sincerely,

A handwritten signature in cursive script, appearing to read "Kathleen Whitaker".

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

February 8, 2007

RE: Comments on proposed Dog Law regulations

Dear Ms. Bender,

As a concerned citizen of the state of Virginia, I respectfully submit this comment on the proposed changes to the Dog Law regulations in your state of Pennsylvania.

First, I would like to commend the Department of Agriculture and the Bureau of Dog Law Enforcement for proposing amendments to the Dog Law Regulations to improve conditions for dogs housed and bred in commercial breeding operations in Pennsylvania. **It should also be noted that the proposed changes to the regulations do not bring hobby breeders under the Act. The same people who were exempt from the former regulations (i.e. hobby breeders who raise, breed, move, sell, etc. fewer than 26 dogs per year), will continue to be exempt under the revised regulations.**

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Once again, I commend the Department of Agriculture and the Bureau of Dog Law Enforcement for proposing regulations that will improve the conditions for dogs housed and bred in Pennsylvania's commercial kennels. The changes I have noted above will further ensure that such dogs are protected. Thank you for your time and consideration.

I am not a resident of PA but I am totally familiar with the puppy mills in your state and know that many are among the Amish people which surprised me at first. They obviously love God but have little or no respect for God's creatures. Please enact and enforce these laws on the behalf of all dogs. Thanks for your consideration.

Sincerely,

*Deann J. Reed*



Deann J. Reed  
2337 Lee Jackson Hwy  
Staunton VA 24401

January 24, 2007

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

Dear Ms. Bender,

As a Pennsylvania breeder, I am strongly opposed to the overly restrictive rules and regulations that are proposed for kennel owners. The enforcement of regulations such as these will effectively serve to shut down or severely curtail the activities of the concerned, caring and law-abiding breeders in Pennsylvania. The extensive number of regulations outlined in this proposal and the limited time allotted prevents the proper consultation and review of these regulations with our kennel veterinarian and other professionals. Therefore, in order to allow for the proper review and consultation of this extensive proposal, I request a ninety-day extension of the comment period.

As a Pennsylvania breeder, my goal and the goal of other law-abiding breeders is to raise the best quality and healthiest puppy possible. This is not the issue. Unfortunately, the issue created by this proposal is my rights as a citizen of this state to own property, and my rights to be afforded due process guaranteed by the provisions of our state's constitution. The vagueness of this proposal causes great concern that my rights as a citizen will be omitted by the bias opinion of those who will hear my side of the story.

As a Pennsylvania breeder, I am concerned that these overly burdensome regulations will have severe unforeseen consequences. These include reduced number of breeders willing to deal with the excessive administrative burden caused by these regulations. The shortages of puppies and resulting higher prices, which will encourage the import of oversea and out of state puppies. The ensuing shortages will provide a lucrative opportunity for those who operate beneath the law to fill these shortages. Those who participate in this black market will find the rewards well worth the risk. Additionally, the economic loss to the state will be in the millions, and will go far beyond the breeder to include pet supply retailers, cities who sponsor shows, and state tax revenue.

As a Pennsylvania breeder, I believe it is unfortunate that this proposal appears to be more about animal activism than about animal welfare. You only have to consider the one section that permits shelters and other similar facilities that provide a "service" to be exempt from these regulations. I immediately question the intent behind those who are pushing the governor on this issue. What sense does it make to remove animals from a substandard facility and place them in another substandard facility? None! Furthermore, this proposal has no incentives or educational programs for the breeders. It is all threats and punishment, which is another indication, that the motives of those supporting this proposal are more interested in eliminating our industry than in improving our industry.

Sincerely,



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

February 2, 2007

RE: Comments on proposed Dog Law regulations

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Patricia C. Margarano.  
325 Jacks Run Rd  
Pittsburgh, Pa. 15202

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

February 2, 2007

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Bureau of Dog Law Enforcement  
Pennsylvania Department of Agriculture  
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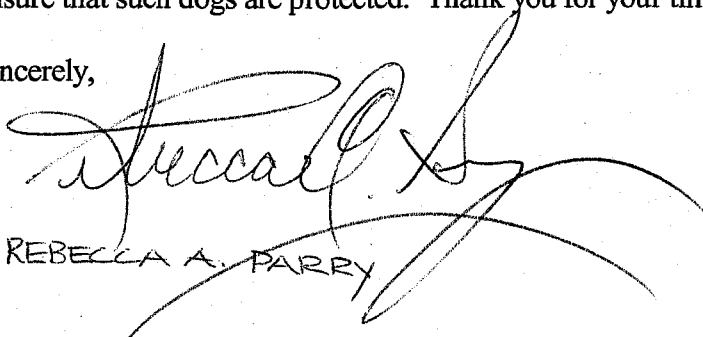
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REBECCA A. PARRY

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*Dmitri Platon*

Ph. D.

21 Trotter Ln.

Clinton, PA 15026

Feb 5, 2007

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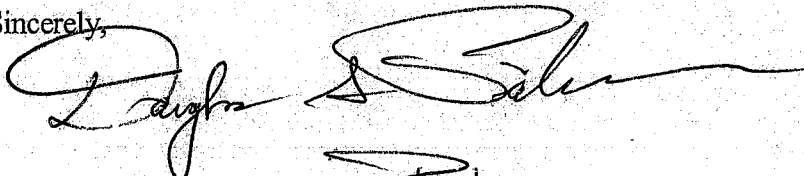
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Douglas S. Palmer

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

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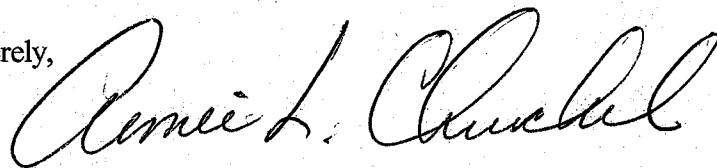
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Latrobe PA 15650



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9. The section on wire mesh flooring should be amended to make it at least as strict as the federal Animal Welfare Act, which requires that metal strand flooring be greater than one-eighth of an inch in diameter (9 gauge) or coated with a material such as plastic or fiberglass. Language should also be added requiring that all primary enclosures that have wire mesh flooring also have a resting board of sufficient size to allow each dog in the enclosure to lie in a full lateral recumbent position and be able to make normal postural adjustments. Resting boards are necessary to provide for the comfort of the dog and to allow the animal to have some time away from living on grated fencing. Providing resting boards will result in fewer foot lesions and other foot and leg injuries to the dogs. A solid resting surface that is impervious to moisture is also a more natural environment for the animal, provides a draft-free surface and enables the dog to retain its body heat. A dog feels most vulnerable when lying down, and forcing a dog to lie over an exposed area can contribute to anxiety. Humane standards and survival standards are separate, and creating an environment that merely allows for survival does not necessarily make such an environment humane.

10. Contrary to what the breeding industry states, the engineering standards specified in the proposed regulations do have a scientific foundation. The standards in the proposed regulations are more akin to acceptable husbandry practices. They will bring the engineering standards up to par with, if not above, those set forth in the Animal Welfare Act. Contrary to the hobby breeders' contention, the new regulations will not bring hobby breeders under the purview of the Dog Law. Only kennels that keep, harbor, board, shelter, sell, give away, or transfer *a cumulative total of 26 or more dogs* in one calendar year will be required to comply with the new regulations. As a result, true hobby breeders are still exempt from the law. Good husbandry practices dictate that anyone harboring a larger number of dogs (26 or more) should comply with certain engineering standards to ensure the health, safety, and well-being of the dogs. The Dog Law and its regulations are aimed at regulating larger and commercial breeding facilities. Therefore, the new regulations will not affect hobby breeders, contrary to what the breeding community suggests.

Once again, I commend the Department of Agriculture and the Bureau of Dog Law Enforcement for proposing regulations that will improve the conditions for dogs housed and bred in Pennsylvania's commercial kennels. The changes I have noted above will further ensure that such dogs are protected. Thank you for your time and consideration.

Sincerely,

*Stephanie L. Smith*

January 24, 2007

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

Dear Ms. Bender,

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Sincerely,

*Jacob E. Glick*

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Sincerely,

Alberta Kovall  
Box 20  
CARROLLTOWN, PA 15722

814-344-8854

January 24, 2007

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

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Sincerely,

*David Legg*

Ben E. Kauffman  
358 Bell Rd.  
Christiana PA 17509

2007 Feb -

January 24, 2007

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Pennsylvania Department of Agriculture  
2301 North Cameron Street  
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Sincerely, *Bennie E. Kauffman*

358 Bell Rd.  
CHRISTIANA PA 17509

January 24, 2007

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Independent Regulatory Review Commission  
333 Market Street, 14<sup>th</sup> Floor  
Harrisburg, PA 17101

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Mike Kovall

Box 20

Canolltown, Pa 15722

814-344-8854

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2301 North Cameron Street  
Harrisburg, PA 17110-9408

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*John S. Blank*

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

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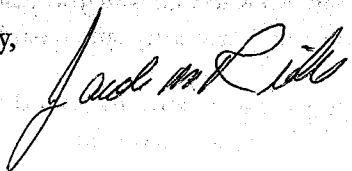
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Sincerely,

John Venturini  
For Pet Lovers Only  
730 Milford Rd  
E. Stroudsburg, PA 18301 570 421 2862

January 24, 2007

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

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Sincerely,

*Paul D Zetsler*

January 24, 2007

Arthur Coccodrilli, Chairman  
Independent Regulatory Review Commission  
333 Market Street, 14<sup>th</sup> Floor  
Harrisburg, PA 17101

Dear Chairman Coccodrilli,

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*Michael Jute*

January 24, 2007

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Pennsylvania Department of Agriculture  
2301 North Cameron Street  
Harrisburg, PA 17110-9408

Dear Ms. Bender,

As a Pennsylvania breeder, I am strongly opposed to the overly restrictive rules and regulations that are proposed for kennel owners. The enforcement of regulations such as these will effectively serve to shut down or severely curtail the activities of the concerned, caring and law-abiding breeders in Pennsylvania. The extensive number of regulations outlined in this proposal and the limited time allotted prevents the proper consultation and review of these regulations with our kennel veterinarian and other professionals. Therefore, in order to allow for the proper review and consultation of this extensive proposal, I request a ninety-day extension of the comment period.

As a Pennsylvania breeder, my goal and the goal of other law-abiding breeders is to raise the best quality and healthiest puppy possible. This is not the issue. Unfortunately, the issue created by this proposal is my rights as a citizen of this state to own property, and my rights to be afforded due process guaranteed by the provisions of our state's constitution. The vagueness of this proposal causes great concern that my rights as a citizen will be omitted by the bias opinion of those who will hear my side of the story.

As a Pennsylvania breeder, I am concerned that these overly burdensome regulations will have severe unforeseen consequences. These include reduced number of breeders willing to deal with the excessive administrative burden caused by these regulations. The shortages of puppies and resulting higher prices, which will encourage the import of oversea and out of state puppies. The ensuing shortages will provide a lucrative opportunity for those who operate beneath the law to fill these shortages. Those who participate in this black market will find the rewards well worth the risk. Additionally, the economic loss to the state will be in the millions, and will go far beyond the breeder to include pet supply retailers, cities who sponsor shows, and state tax revenue.

As a Pennsylvania breeder, I believe it is unfortunate that this proposal appears to be more about animal activism than about animal welfare.—You only have to consider the one section that permits shelters and other similar facilities that provide a "service" to be exempt from these regulations. I immediately question the intent behind those who are pushing the governor on this issue. What sense does it make to remove animals from a substandard facility and place them in another substandard facility? None! Furthermore, this proposal has no incentives or educational programs for the breeders. It is all threats and punishment, which is another indication, that the motives of those supporting this proposal are more interested in eliminating our industry than in improving our industry.

Sincerely,

*Michael C. Muller*

January 24, 2007

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

Dear Ms. Bender,

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*Seonved newwanger*

January 24, 2007

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Pennsylvania Department of Agriculture  
2301 North Cameron Street  
Harrisburg, PA 17110-9408

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Sincerely,

*John Martin*



January 24, 2007

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

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Sincerely,

*Mary Martin*

January 24, 2007

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

Dear Ms. Bender,

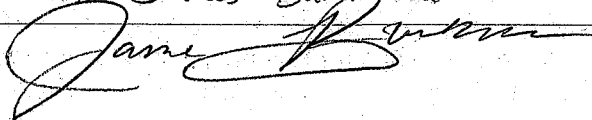
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Sincerely, James Burkholder



January 24, 2007

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

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Sincerely,

*James S. Stoff*  
*Lydia Mae Stoff*

January 24, 2007

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

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Sincerely,

*R. A. Lapp*

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

February 2, 2007

RE: Comments on proposed Dog Law regulations

Dear Ms. Bender,

As a concerned citizen of the state of Pennsylvania, I respectfully submit this comment on the proposed changes to the Dog Law regulations.

First, I would like to commend the Department of Agriculture and the Bureau of Dog Law Enforcement for proposing amendments to the Dog Law Regulations to improve conditions for dogs housed and bred in commercial breeding operations in Pennsylvania. **It should also be noted that the proposed changes to the regulations do not bring hobby breeders under the Act. The same people who were exempt from the former regulations (i.e. hobby breeders who raise, breed, move, sell, etc. fewer than 26 dogs per year), will continue to be exempt under the revised regulations.**

Furthermore, I fully support the comments submitted by the American Society for the Prevention of Cruelty to Animals (ASPCA) on behalf of its members, and incorporate them herein by reference. Specifically, I strongly support the following:

1. The penalties in § 21.4(1)(iii) for "failure of an individual to comply with licensure provisions" should be increased from \$25 to \$300 per violation to \$25 to \$300 *per day of violation*.
2. The Secretary should be mandating to file suit to enjoin operation of unlicensed kennels where the kennel is not in compliance with the standards in the regulations and is unable to qualify for a license.
3. I commend the Department of Agriculture and the Bureau of Dog Law Enforcement for doubling the required cage size. This is perhaps the most important change that can be made to improve the quality of life for dogs in commercial breeding facilities in Pennsylvania. This provision should remain in the regulations regardless of opposition from breeders. This section should be further strengthened by adding a provision stating that where more than one dog is housed in a primary enclosure, the primary enclosure must provide adequate space for all dogs. For instance, if the enclosure houses two dogs, it must provide double the cage space that would be required for a single dog. If it houses three dogs, it must provide three times the cage space, etc.

4. I also commend the Department of Agriculture and Bureau of Dog Law Enforcement for including a provision that requires the dog wardens to visually observe the physical condition of each dog. However, the provisions regarding orders of veterinary care should be strengthened to state that the owner must provide "proof of *current and proper* veterinary care for the dog." This provision should also be amended to include excessive matting and excessively long toenails as indications of lack of proper veterinary care. Inadequate grooming can lead to painful medical issues for dogs, including skin lesions from excessive matting and leg and joint injuries from failure to keep toenails appropriately trimmed. Moreover, the section should be amended to *require* dog wardens to order a veterinary check on dogs that exhibit signs of infection, contagious disease or parasite; or that appear to be in poor health where proof of current and proper veterinary care is not provided.

5. A new subsection should be added to § 21.30 clarifying the required training for dog wardens. Training in the following areas should be added into the regulations to expand upon the requirements set forth in 3 P.S. § 459-901:

1. State laws relating to dog licensing, control and owner responsibilities;
2. State and federal laws relating to animal care, cruelty and neglect;
3. State laws relating to dangerous dogs;
4. State and federal law relating to lack of arrest powers, proper use of search, seizure and warrants;
5. State and federal laws relating to pounds and shelters;
6. Basics of cruelty and neglect investigations for referral to appropriate authorities;
7. Report-writing and record-keeping;
8. Overview of the legal system, court structure and terminology;
9. Basics of interpreting animal behavior;
10. Identification of injury, disease, abuse and neglect in dogs;
11. Animal hoarders; and
12. Civil liability issues.

6. A new section should be added to the regulations mandating that the Department and dog wardens coordinate and work with law enforcement when applicable. It is imperative that the department work with law enforcement, and specifically Humane Society police officers, to ensure that both the cruelty laws and the Dog Law are adequately enforced.

7. A new section should be added to the regulations requiring that a licensee must have enough employees to carry out the level of husbandry practices and care required by the Act and its regulations. Additionally, the employees who provide for care and husbandry or handle animals should be supervised by an individual who has the knowledge, background, and experience in proper husbandry and care of dogs to supervise others. The licensee must be certain that the supervisor and other employees can perform to such standards.

8. Stacking primary enclosures on top of one another should be prohibited. Stacking cages creates an unnatural environment for the dogs. Additionally, it makes observation of the dogs more difficult and creates sanitation problems. Even with a tray or partition between cages, it is likely that the partitions may overflow, causing feces, urine, food, water, and hair to fall onto the dogs located in the cages below.

9. The section on wire mesh flooring should be amended to make it at least as strict as the federal Animal Welfare Act, which requires that metal strand flooring be greater than one-eighth of an inch in diameter (9 gauge) or coated with a material such as plastic or fiberglass. Language should also be added requiring that all primary enclosures that have wire mesh flooring also have a resting board of sufficient size to allow each dog in the enclosure to lie in a full lateral recumbent position and be able to make normal postural adjustments. Resting boards are necessary to provide for the comfort of the dog and to allow the animal to have some time away from living on grated fencing. Providing resting boards will result in fewer foot lesions and other foot and leg injuries to the dogs. A solid resting surface that is impervious to moisture is also a more natural environment for the animal, provides a draft-free surface and enables the dog to retain its body heat. A dog feels most vulnerable when lying down, and forcing a dog to lie over an exposed area can contribute to anxiety. Humane standards and survival standards are separate, and creating an environment that merely allows for survival does not necessarily make such an environment humane.

10. Contrary to what the breeding industry states, the engineering standards specified in the proposed regulations do have a scientific foundation. The standards in the proposed regulations are more akin to acceptable husbandry practices. They will bring the engineering standards up to par with, if not above, those set forth in the Animal Welfare Act. Contrary to the hobby breeders' contention, the new regulations will not bring hobby breeders under the purview of the Dog Law. Only kennels that keep, harbor, board, shelter, sell, give away, or transfer *a cumulative total of 26 or more dogs* in one calendar year will be required to comply with the new regulations. As a result, true hobby breeders are still exempt from the law. Good husbandry practices dictate that anyone harboring a larger number of dogs (26 or more) should comply with certain engineering standards to ensure the health, safety, and well-being of the dogs. The Dog Law and its regulations are aimed at regulating larger and commercial breeding facilities. Therefore, the new regulations will not affect hobby breeders, contrary to what the breeding community suggests.

Once again, I commend the Department of Agriculture and the Bureau of Dog Law Enforcement for proposing regulations that will improve the conditions for dogs housed and bred in Pennsylvania's commercial kennels. The changes I have noted above will further ensure that such dogs are protected. Thank you for your time and consideration.

Sincerely,

Mary Z. Stewart

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

February 2, 2007

RE: Comments on proposed Dog Law regulations

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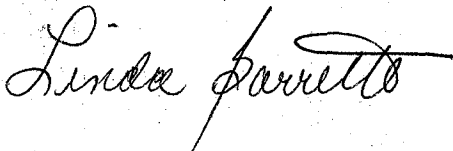
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Sincerely,

A handwritten signature in cursive script that reads "Linda Pavetto". The signature is written in dark ink and is positioned below the typed name "Linda Pavetto".

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

February 2, 2007

RE: Comments on proposed Dog Law regulations

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*Kim E. Brown*

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

February 2, 2007

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Bureau of Dog Law Enforcement  
Pennsylvania Department of Agriculture  
Attn: Ms. Mary Bender  
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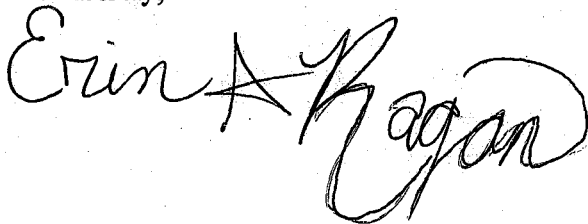
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Bureau of Dog Law Enforcement  
Pennsylvania Department of Agriculture  
Attn: Ms. Mary Bender  
2301 North Cameron Street  
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February 2, 2007

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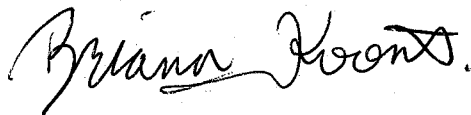
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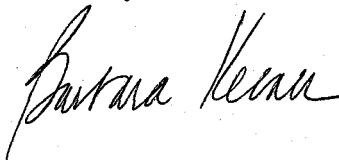
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Sincerely,



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

February 2, 2007

RE: Comments on proposed Dog Law regulations

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Donna Dombkowski

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

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*Sandra J Malenich*  
PO Box 155  
Hyde Pa 16843

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

February 6, 2007

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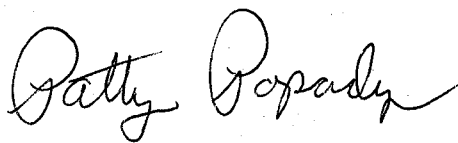
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131 BUCKHILL RD

Pott, PA. 15237

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

February 2, 2007

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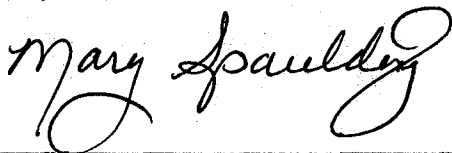
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A handwritten signature in cursive script that reads "Mary Spaulding". The signature is written in dark ink and is positioned below the typed name "Mary Spaulding".

Bureau of Dog Law Enforcement  
Pennsylvania Department of Agriculture  
Attn: Ms. Mary Bender  
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February 2, 2007

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

February 2, 2007

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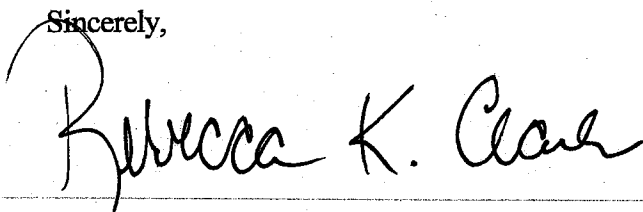
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Bureau of Dog Law Enforcement  
Pennsylvania Department of Agriculture  
Attn: Ms. Mary Bender  
2301 North Cameron Street  
Harrisburg, PA 17110-9408

February 2, 2007

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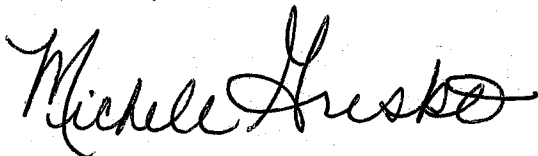
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Bureau of Dog Law Enforcement  
Pennsylvania Department of Agriculture  
Attn: Ms. Mary Bender  
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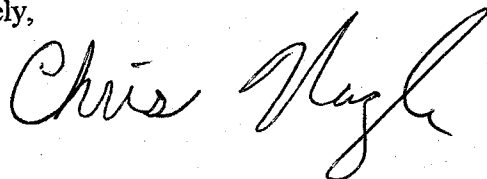
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Bureau of Dog Law Enforcement  
Pennsylvania Department of Agriculture  
Attn: Ms. Mary Bender  
2301 North Cameron Street  
Harrisburg, PA 17110-9408

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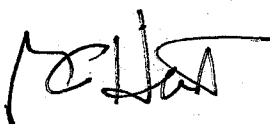
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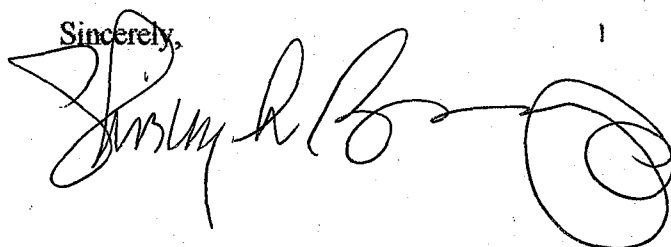
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formerly Delaware Valley Akita Rescue

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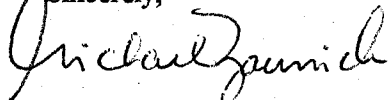
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MICHAEL D ZAUNICK  
4 COBBLESTONE COURT  
BRADFORD PA 16701-3068

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

February 2, 2007

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610-359-0185

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701 Montgomery Avenue  
Bryn Mawr, PA 19010

Bureau of Dog Law Enforcement  
Pennsylvania Department of Agriculture  
Attn: Ms. Mary Bender  
2301 North Cameron Street  
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2/7/07

February 5, 2007

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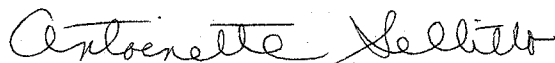
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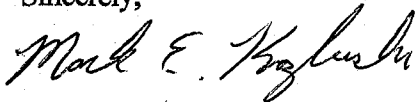
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Sincerely,





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

February 2, 2007

RE: Comments on proposed Dog Law regulations

Dear Ms. Bender,

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3. I commend the Department of Agriculture and the Bureau of Dog Law Enforcement for doubling the required cage size. This is perhaps the most important change that can be made to improve the quality of life for dogs in commercial breeding facilities in Pennsylvania. This provision should remain in the regulations regardless of opposition from breeders. This section should be further strengthened by adding a provision stating that where more than one dog is housed in a primary enclosure, the primary enclosure must provide adequate space for all dogs. For instance, if the enclosure houses two dogs, it must provide double the cage space that would be required for a single dog. If it houses three dogs, it must provide three times the cage space, etc.

4. I also commend the Department of Agriculture and Bureau of Dog Law Enforcement for including a provision that requires the dog wardens to visually observe the physical condition of each dog. However, the provisions regarding orders of veterinary care should be strengthened to state that the owner must provide "proof of *current and proper* veterinary care for the dog." This provision should also be amended to include excessive matting and excessively long toenails as indications of lack of proper veterinary care. Inadequate grooming can lead to painful medical issues for dogs, including skin lesions from excessive matting and leg and joint injuries from failure to keep toenails appropriately trimmed. Moreover, the section should be amended to *require* dog wardens to order a veterinary check on dogs that exhibit signs of infection, contagious disease or parasite; or that appear to be in poor health where proof of current and proper veterinary care is not provided.

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Sincerely,

*Janice M. Miller*

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

February 10, 2007

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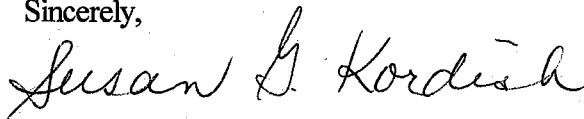
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Bureau of Dog Law Enforcement  
Pennsylvania Department of Agriculture  
Attn: Ms. Mary Bender  
2301 North Cameron Street  
Harrisburg, PA 17110-9408

February 2, 2007

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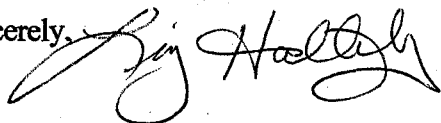
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Bureau of Dog Law Enforcement  
Pennsylvania Department of Agriculture  
Attn: Ms. Mary Bender  
2301 North Cameron Street  
Harrisburg, PA 17110-9408

February 2, 2007

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Sincerely,

*Chris Chawlick*

Chris Chawlick  
1028 Saxonburg Blvd  
Glenshaw, PA 15116

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Pennsylvania Department of Agriculture  
Attn: Ms. Mary Bender  
2301 North Cameron Street  
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First, I would like to commend the Department of Agriculture and the Bureau of Dog Law Enforcement for proposing amendments to the Dog Law Regulations to improve conditions for dogs housed and bred in commercial breeding operations in Pennsylvania. **It should also be noted that the proposed changes to the regulations do not bring hobby breeders under the Act. The same people who were exempt from the former regulations (i.e. hobby breeders who raise, breed, move, sell, etc. fewer than 26 dogs per year), will continue to be exempt under the revised regulations.**

Furthermore, I fully support the comments submitted by the American Society for the Prevention of Cruelty to Animals (ASPCA) on behalf of its members, and incorporate them herein by reference. Specifically, I strongly support the following:

1. The penalties in § 21.4(1)(iii) for "failure of an individual to comply with licensure provisions" should be increased from \$25 to \$300 per violation to \$25 to \$300 *per day of violation*.
2. The Secretary should be mandating to file suit to enjoin operation of unlicensed kennels where the kennel is not in compliance with the standards in the regulations and is unable to qualify for a license.
3. I commend the Department of Agriculture and the Bureau of Dog Law Enforcement for doubling the required cage size. This is perhaps the most important change that can be made to improve the quality of life for dogs in commercial breeding facilities in Pennsylvania. This provision should remain in the regulations regardless of opposition from breeders. This section should be further strengthened by adding a provision stating that where more than one dog is housed in a primary enclosure, the primary enclosure must provide adequate space for all dogs. For instance, if the enclosure houses two dogs, it must provide double the cage space that would be required for a single dog. If it houses three dogs, it must provide three times the cage space, etc.

4. I also commend the Department of Agriculture and Bureau of Dog Law Enforcement for including a provision that requires the dog wardens to visually observe the physical condition of each dog. However, the provisions regarding orders of veterinary care should be strengthened to state that the owner must provide "proof of *current and proper* veterinary care for the dog." This provision should also be amended to include excessive matting and excessively long toenails as indications of lack of proper veterinary care. Inadequate grooming can lead to painful medical issues for dogs, including skin lesions from excessive matting and leg and joint injuries from failure to keep toenails appropriately trimmed. Moreover, the section should be amended to *require* dog wardens to order a veterinary check on dogs that exhibit signs of infection, contagious disease or parasite; or that appear to be in poor health where proof of current and proper veterinary care is not provided.

5. A new subsection should be added to § 21.30 clarifying the required training for dog wardens. Training in the following areas should be added into the regulations to expand upon the requirements set forth in 3 P.S. § 459-901:

1. State laws relating to dog licensing, control and owner responsibilities;
2. State and federal laws relating to animal care, cruelty and neglect;
3. State laws relating to dangerous dogs;
4. State and federal law relating to lack of arrest powers, proper use of search, seizure and warrants;
5. State and federal laws relating to pounds and shelters;
6. Basics of cruelty and neglect investigations for referral to appropriate authorities;
7. Report-writing and record-keeping;
8. Overview of the legal system, court structure and terminology;
9. Basics of interpreting animal behavior;
10. Identification of injury, disease, abuse and neglect in dogs;
11. Animal hoarders; and
12. Civil liability issues.

6. A new section should be added to the regulations mandating that the Department and dog wardens coordinate and work with law enforcement when applicable. It is imperative that the department work with law enforcement, and specifically Humane Society police officers, to ensure that both the cruelty laws and the Dog Law are adequately enforced.

7. A new section should be added to the regulations requiring that a licensee must have enough employees to carry out the level of husbandry practices and care required by the Act and its regulations. Additionally, the employees who provide for care and husbandry or handle animals should be supervised by an individual who has the knowledge, background, and experience in proper husbandry and care of dogs to supervise others. The licensee must be certain that the supervisor and other employees can perform to such standards.

8. Stacking primary enclosures on top of one another should be prohibited. Stacking cages creates an unnatural environment for the dogs. Additionally, it makes observation of the dogs more difficult and creates sanitation problems. Even with a tray or partition between cages, it is likely that the partitions may overflow, causing feces, urine, food, water, and hair to fall onto the dogs located in the cages below.

9. The section on wire mesh flooring should be amended to make it at least as strict as the federal Animal Welfare Act, which requires that metal strand flooring be greater than one-eighth of an inch in diameter (9 gauge) or coated with a material such as plastic or fiberglass. Language should also be added requiring that all primary enclosures that have wire mesh flooring also have a resting board of sufficient size to allow each dog in the enclosure to lie in a full lateral recumbent position and be able to make normal postural adjustments. Resting boards are necessary to provide for the comfort of the dog and to allow the animal to have some time away from living on grated fencing. Providing resting boards will result in fewer foot lesions and other foot and leg injuries to the dogs. A solid resting surface that is impervious to moisture is also a more natural environment for the animal, provides a draft-free surface and enables the dog to retain its body heat. A dog feels most vulnerable when lying down, and forcing a dog to lie over an exposed area can contribute to anxiety. Humane standards and survival standards are separate, and creating an environment that merely allows for survival does not necessarily make such an environment humane.

10. Contrary to what the breeding industry states, the engineering standards specified in the proposed regulations do have a scientific foundation. The standards in the proposed regulations are more akin to acceptable husbandry practices. They will bring the engineering standards up to par with, if not above, those set forth in the Animal Welfare Act. Contrary to the hobby breeders' contention, the new regulations will not bring hobby breeders under the purview of the Dog Law. Only kennels that keep, harbor, board, shelter, sell, give away, or transfer a cumulative total of 26 or more dogs in one calendar year will be required to comply with the new regulations. As a result, true hobby breeders are still exempt from the law. Good husbandry practices dictate that anyone harboring a larger number of dogs (26 or more) should comply with certain engineering standards to ensure the health, safety, and well-being of the dogs. The Dog Law and its regulations are aimed at regulating larger and commercial breeding facilities. Therefore, the new regulations will not affect hobby breeders, contrary to what the breeding community suggests.

Once again, I commend the Department of Agriculture and the Bureau of Dog Law Enforcement for proposing regulations that will improve the conditions for dogs housed and bred in Pennsylvania's commercial kennels. The changes I have noted above will further ensure that such dogs are protected. Thank you for your time and consideration.

Sincerely,

Joanne Ray  
129 Billingsley Dr.  
Chalfont PA 18914



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

February 2, 2007

RE: Comments on proposed Dog Law regulations

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Linda Cavaleri & Donald A. Long  
102 Meckesville Rd.  
Albrightsville, Pa  
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570 722-0752