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Ithaca NY 14850
Feb 10 2007*

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INDEPENDENT REGULATORY
REVIEW COMMISSION

Ms. Mary Bender
Department of Agriculture
Bureau of Dog Law Enforcement
2301 North Cameron Street
Harrisburg, PA 17110-9408
February 5, 2007

RE: ID #2-152 (#2559)

Dear Ms Bender:

Please reconsider the above captioned regulations pertaining to dog owners, breeders, trainers, and veterinarians. They will force many excellent animal caregivers and breeders to close, but they will not affect the large corporate enterprises which are behind some of the "puppy mill" operations which the regulations were meant to control.

The illegal and semi-legal small puppy mills would not be affected at all.

Smaller businesses, which typically employ only one, two, or three people, could not afford the time or the cost of compliance.

The loss of these smaller businesses would not only cost the livelihoods of many people, but would close some of the best and most humane dog breeders and caregivers.

I could write a very long letter about why the provisions, as they are currently written, would do irreparable harm to the humane breeding and care of dogs in your state, but neither your time nor the space available would permit that. I will mention only three things – the cost of "upgrading" facilities, the huge paperwork burden (six forms a day, on every dog? Is that really thinkable?), and the severe limitations on interstate transport of dogs would immediately shut down some of the best facilities in your state.

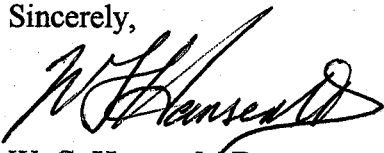
Over the past few decades our family has had occasion to visit as many as 30 different veterinarian, boarding, training, and dog breeding operations in New York and Pennsylvania. We know the difference between a poorly run operation, an unsafe and/or unsanitary one, and a good or excellent one.

We've been fortunate to know two very fine breeders of dogs in your state, and one excellent small animal hospital. I am very familiar with all three of them. The facilities they include are clean, safe, and spacious. The care provided is excellent and humane. Dogs are appropriately housed and fed. The breeders are known throughout the Northeast of the US for giving their dogs and pups a great deal of individual attention, and for providing animals of sound health and temperament. I've been assured that all three

would have to close. Specific information has been presented to me about why closure would be unavoidable.

I plead with you once again – please reconsider these regulations. They will not help anyone but the large corporate operators. They will force many excellent small and midsized animal care operations (veterinarians, boarding facilities, trainers, and breeders) to close. Something must be done to eliminate the puppy mills, but the currently proposed regulatory changes will not accomplish that goal. They will do much more harm than good.

Sincerely,



W. G. Hansen M.D.