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

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James and Audrey Williams
6324 Arlingham Rd.
Flourtown, PA 19031-1637

INDEPENDENT REGULATORY
REVIEW COMMISSION

February 10, 2007

Dear Ms. Bender:

We are writing regarding the currently proposed revisions to the PA Dog Law Regulations. We are small hobby breeders of pure bred Bearded Collies and take much pride in the quality and temperament of the puppies we produce, as well as joy in making that happen. We show our dogs in AKC conformation and other events and have many friends in the fancy. We have serious concerns about the effect that these regulations would have on the pure bred dog population if the proposed regulations are enforced as stated.

We personally seldom have more than one litter a year, but have had two, and now that we're retired would conceivably like to have more than that number. Many of our acquaintances breed three or more litters a year, and produce excellent puppies, most of which are placed as companion dogs and backed up by the support of a knowledgeable breeder. We could all easily fall into the Level I Kennel category. Upon reading through the proposed regulations, the facility requirements would preclude any possibility of most of us becoming a registered kennel.

- Concrete or pebbled runs with specified slope and drainage just would not be practical in a suburban setting where most of us reside, to say nothing of not meeting township regulations.
- Exercise requirements for dogs are much better met on a grassy yard or one with a soft surface such as wood chips rather than a hard surface such as concrete.
- Our small puppies are socialized by interacting with the older dogs from time to time, and would not meet the division in weight requirements of the proposed revisions.
- Sanitation needs are met by regularly picking up after our dogs, not by hosing with chemicals down a 6" drain, where a puppy, or older dog for that matter, could conceivably be injured.

That being said, we absolutely agree that there are major issues regarding conditions that we deplore in many of the large commercial kennels in the state. We need to find a creative way to apply regulations to the larger "for profit" kennels without penalizing the small responsible breeders who are supplying the best puppies to the public. If the Dog Law needs to be revised to accomplish this, so be it.

We applaud the attempts of Gov. Rendell and Jessie Smith of the Dog Law Advisory Board to regulate the inhumane canine conditions prevalent in our state. Please do not paint us all with the same brush!

Sincerely Yours,

Audrey M. Williams
James Williams