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Bender, Mary

INDEPENDENT REGULATORY
REVIEW COMMISSION

From: MistyM629@aol.com
Sent: Saturday, February 10, 2007 12:22 PM
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Subject: Dog Law Enforcement Amendments

This letter is in regard to the proposed changes to the PA Dog Law Regulations (ID No. 2-152) made public December 16, 2006.

As the owner and operator of Misty Meadows Boarding & Grooming Inc. in Quakertown, PA, I am very familiar with both the PA Dog Law Regulations and the USDA Regulations (Animal Welfare Act). I am pleased to see that many of these proposed changes will adopt both content and wording of the USDA Regulations. I have long felt that many parts of the PA Regulations were vague, having too many areas left to interpretation by both the Inspectors and kennel operators.

My biggest area of concern, and opposition, is the proposed change in record keeping, namely, the recording of specific activities addressing each dog, each time, every day. The need to record the time and date of cleaning/changing food and water bowls, the times primary enclosures are cleaned and sanitized, and when dogs are exercised/walked, etc, would be time consuming. What is being proposed requires me to record each time any task is completed no matter how many times in a given day it is performed.

If the Regulations stated that *these tasks needed to be done daily, or more as needed*, any responsible kennel operator would do it, as I am sure most already operate in this manner. It is challenging enough to stay in business at the present time with rising costs, including the recent increase in minimum wage. Adding something more for kennel staff to do on a daily basis will only increase labor costs, and perhaps force many good and compliant kennels out of business.

I feel that any changes to the new PA Regulations should simply state what needs to be done, and leave it to the kennel operator to ensure a safe, clean and sanitary environment. I would suggest that each kennel have on file, and available to Inspectors, their SOP (Standard Operating Procedures). These would describe in detail how they do basic animal care and cleaning, and this would alleviate the need for numerous daily record entries.

Thank you for your time and consideration in this matter.

Garen R. Lindsay
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