

February 12, 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:

My husband and I have been kennel licensees for many years in the Commonwealth of Pennsylvania (Chester County). Our kennels are Lewisville Hunt and Windy Hill Kennels. We have foxhounds and Parson Russell Terriers, and we do not breed for profit. I have closely monitored my small breeding program for well over two decades, striving to improve my breed for the show ring. I have had great success, with a kennel of champions as proof. Our interest is in the love of our dogs, both in sport and in the show ring.

I was alerted to the proposed amendments to the Pennsylvania dog law regulations issued on December 16, 2006. While we abhor the thought of inhumane treatment and substandard kennel conditions, we do not agree with the proposed amendments, which would only hurt the honest breeders and kennel owners. We see the current legislation as quite appropriate – it just needs to be enforced. And while on that subject, who is going to enforce this proposed legislation – someone chosen by a politician and who has no practical experience with raising dogs? The thought of the mess this would cause is pretty scary.

**We especially take exception to this proposed legislation having obviously been written by those with little or no experience with dogs. This makes no sense.**

**Examples of problems with the proposal are the following:**

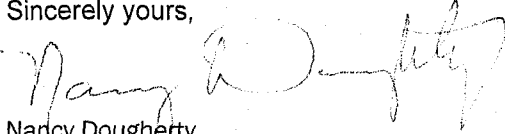
- There is no scientific or accepted husbandry basis for the amended space and exercise requirements. Some of this is downright ridiculous.
- The regulations will require wholesale renovation, if not rebuilding, of many kennels already built in compliance with current federal and/or state standards. 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. Obviously, whoever wrote this section is entirely unfamiliar with dogs and their social structure.

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. We urge that this proposal be withdrawn.

In conclusion, go after the known puppy mills and worse, dog-fighting people (we all know they exist) and put these people out of business. Please do not punish those of us (the majority who love our dogs and take the very best care of them). This proposed legislation is utterly ridiculous and a huge waste of the taxpayers' money.

Thank you for your consideration.

Sincerely yours,

A handwritten signature in cursive script, appearing to read "Nancy Dougherty". The signature is written in dark ink and is positioned above the printed name.

Nancy Dougherty  
John W. Dougherty  
PO Box 121  
Lewisville, PA 19351