

To Whom It May Concern:

2559

The dog "hobbyist breeder" in response to the proposed Rulemaking to the Department of Agriculture Dog Enforcement would like to be removed from these requirements and have listed below the reasons that this request is being made. These proposed revisions are not appropriate for hobbyist breeder and in particular #3 below explains why, additionally to enforce these "commercial kennel" type revisions would impart a hardship on the hobbyist breeder.

There is a vast difference between the hobbyist breeder and those other entities: commercial kennels, retail sellers, and puppy millers. First and foremost is that profit sets them apart, also commercial kennels, retail pet store puppy brokers and puppy millers are in the business of treating purebred dogs as a commodity, livestock if you will, which is the complete opposite of the hobbyist breeder philosophy.

The true purpose of the dog hobbyist breeder is to perfect the breed and to keep it consistent to the original breed standard including breeding for health and temperament. Additionally, we breed out of reverence, love and respect for the individual breeds and the following listing defines the differences in breeding practices that sets the hobbyist breeder apart from the commercial, retailer/puppy miller.

1. Hobbyist breeders regularly exhibit their dogs at American Kennel Club Association-sanctioned dog shows for the purpose of selecting the most correct "type" to be awarded championship titles by independent judges who have the breed standard in front of them, thereby to perpetuate the breed as it was intended originally.
2. Potential breeding animals, before they are finished as champions go through thorough tests for hip dysplasia, elbows, cardiac testing, thyroid panels, CERF (eyes) and any other known genetic predisposition for the respective breed to ensure the health of the breed.
3. Parents and litters are raised on the hobbyists property, normally in the house and experience a great amount of socialization, not only having the normal clean housing, water and food, but also experience living in a house with daily socialization and affection given, which ensures a good temperament in the dog and also allows for evaluation of the individual dog's temperament. A dog if found to have a questionable temperament would be neutered and not bred. A great premium is put upon this type of socialization and requires hands on treatment for a period of not less than 60 days at which a puppy would be ready no sooner than 8 weeks to go into his new home, often times it could occur up to 12-16 weeks. Hobbyist breeders have no more than 2 litters on the ground on their premises at any one time.
4. Dog fancy hobbyist breeders put their name on the kennel, and at any point in time any male or female dog can be looked up and the entire family tree can be seen at a glance ensuring the soundness of the line.
5. Dog fancy hobbyist breeders also take great care in placing their puppies; long contracts are drawn up and signed by both the owner of the litter and the new puppy owner. Within these contracts there is great care taken to ensure the well being of this puppy, the hobbyist breeder goes to great lengths to protect their offspring not only at the time of the sale but throughout his/her lifetime.

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Most breeders have a clause in their contract that if for any reason the current owner is unable to care for this puppy at any time between 8 weeks to death this dog must be returned to the breeder for the dog's protection. If a puppy being placed is not considered to be breed standard, then a clause is inserted that the puppy must be neutered and/or spayed to ensure that no accidental breeding take place which is protection for the breed as well as any unwanted puppies.

6. Hobbyist breeders provide education on the breed, support and mentoring to their new puppy owners.
7. Dog fancy hobbyist breeders register their offspring with the American Kennel Club ("AKC") Association and in most instances join their breed specific national breed club who scrutinizes its members breeding practices to ensure protection of their breed.
8. AKC sponsors many conformation and performance events for participation, which enhances the breed and encourages responsible dog ownership. Hobbyist breeders also title their animals in performance events that provide fun and partnership between owners and their dogs, some of these events are: Rally, Tracking, Obedience, Agility, and Lure coursing to name a few. Most animals will pass a Canine Good Citizenship test (which promotes responsible dog ownership) and many breeders have this written into their contracts as a requisite or the dog must be returned. Many of the hobbyist breeders have AKC titled Therapy dogs, who provide a service to their respective communities as well as being ambassadors to their breeds.
9. Dog fancy hobbyist breeders feel a responsibility not only for their own respective breeding, but any other displaced purebred dogs. Most national parent breed clubs have national formal rescue organizations attached to them to ensure that no purebred dog is in harm's way and often rescues mixed breed dogs that show a strong purebred tendencies as well. In many instances the purebred dogs are products of puppy millers who have been bought at auction by non-profit rescue organizations to try to reduce indiscriminate breeding. These animals who often suffer from extreme cases of kennelosis (having lived in a cage with little or no human contact) are vetted, rehabbed and placed into loving second chance homes. This is one of the greatest distinctions between the hobbyist breeder and all others, and these efforts are supported by hobbyist breeders and dog fancy members who spend tens of thousands of dollars annually to purebred rescue.

In closing, what sets the Hobbyist Breeder apart from all others is all of this and more, and that they are active from birth until death in their offspring to ensure proper treatment which encompasses: love and affection, appropriate living quarters, feeding, exercise, and responsible ownership. This is done as a loving "hobby" not for profit. To negatively impact the hobbyist breeder would be doing a great disservice to future families who want to have a healthy and well socialized pets and family members.

DEFINITION OF A HOBBYIST BREEDER COMPARED TO COMMERCIAL KENNELS, PUPPY MILLERS/RETAIL STORES THAT SELL DOGS

Action	Hobbyist breeders	Commercial Kennels/Puppy Millers/Retail Stores
Dam/sire are titled champions	Yes	No
Health tests performed prior to breeding	Yes	No
Potential puppy owners screened	Yes	No
Bred to perfect the breed	Yes	No
Show and title their dogs in performance events and therapy dogs	Yes	No
Puppies bred in the breeder's home	Yes	No
Puppies go back to breeder if new owner cannot keep	Yes	No
Puppies bred as livestock	No	Yes
Puppies are well socialized by breeder before placement	Yes	No
Breeder keeps in contact and acts as a mentor to new owner	Yes	No
National rescue organization attached to breeders' association	Yes	No
Litter registered with AKC before puppies go to new owner	Yes	No