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R. R. 1, Box 13
Thompson, Pa. 18465
February 9, 2007

Bureau of Dog Law Enforcement
Att: Ms. Mary Bender
Pennsylvania Department of Agriculture
2301 North Cameron Street
Harrisburg, Pa. 17110-9408

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INDEPENDENT REGULATORY
REVIEW COMMISSION

Dear Ms. Bender,

I am writing to comment on the proposed amendments to the Pennsylvania dog law regulations that were issued on December 16, 2006. I also believe that inhumane and substandard kennel conditions should not be tolerated, but I do not agree with most of the proposed regulatory changes. They would not have a beneficial outcome if adopted. Many are impractical, excessively burdensome and costly, and for the most part unenforceable. They will not improve the quality of life for the dogs in these kennels.

The definition of "temporary housing" would require thousands of small residential hobby and show breeders to become licensed which could not possibly comply with the regulations – and which, in fact, there is no reason to regulate.

There is no scientific or accepted husbandry basis for the amended space and exercise requirements.

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.

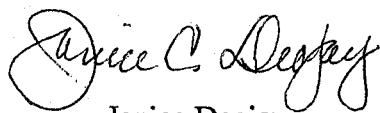
The proposals pertaining to housing and social interaction of dogs of different sizes are contrary to good husbandry, socialization and training practices. Dogs must be socialized so that they can exist in a diverse world where other species exist. If this is not done properly, there will be even worse problems for state governments to deal with.

The above is far from a complete list of the deficiencies with the proposed regulations. I associate myself with the more detailed comments on this proposal by the Pennsylvania Federation of Dog Clubs.

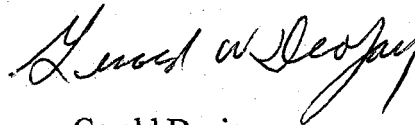
The Bureau has tacitly conceded that its current regulations have not been adequately enforced. If, after implementing its recently announced enhanced enforcement program, the Bureau finds it is still unable to prevent inhumane treatment of dogs because of specific deficiencies in the existing regulations, 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 and they seem to have 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.

The Bureau should consider placing more control in the hands of humane officers so that they may arrest and charge individuals with cruel and inhumane treatment of animals. That is an area that seems to be lax. There was a recent incident in the Poconos in which two dogs were left outside in bitterly cold weather without adequate shelter or food and the local humane officer did nothing even though complaints had been made about the conditions the dogs were living under. This is a situation that should be addressed. Put the Government's money where it will do some good, not writing regulations that are impossible to follow.

Sincerely,



Janice Deojay



Gerald Deojay

Members of: Lackawanna Kennel Club
Colonial Rottweiler Club