

Ms. Karen Schelling
5607 Meadow Drive
Orefield, PA 18069

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INDEPENDENT REGULATORY
REVIEW COMMISSION

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

Dear Ms. Bender,

I am writing because it is my understanding that the Bureau has requested specific comments and suggestions from small hobby breeders, trainers and other interested people regarding the proposed changes to the Pennsylvania Dog Law.

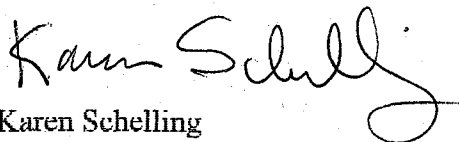
I am an avid competitor in canine sports, primarily those of obedience and agility. I became familiar with these sports quite by accident after adopting a dog from the Montgomery County SPCA some years ago. The dog needed obedience training and I was fortunate enough to find a local and reasonably priced obedience trainer. Because of her I learned to transform poorly-behaved, unsocialized dogs into well-behaved ones. This trainer, now deceased, was eighty-six years old at the time and would never have been able to meet many of the proposed requirements to the PA Dog Law. She trained, as many do, in her back yard. She would not have had the resources to build runs, showers, remove standing water from her yard or to build an exercise area that prevented dogs from becoming muddy. Information is being circulated suggesting that trainers, clubs and other facilities that do not keep dogs for overnight stays will not be considered an "establishment". If this is true, then the law needs to state that specifically. It is my understanding that an "establishment" status applies to anyone who "keeps, maintains, boards, trains", etc., so that trainers would not be exempt from obtaining a kennel license, provided that twenty-six or more dogs cross the threshold in a single year. Obedience and agility clubs would be required to make costly improvements that seem unreasonable, as they would serve no purpose.

Similar issues appear to apply to the small, hobby breeder. My puppy was whelped in my breeder's kitchen, not in a "facility" and was cared for as though he were a member of the family. He was not maintained in a kennel run and was exercised in the back yard. This breeder and many like her are now threatening to move out of state, as the paperwork requirements and physical plant changes would be unrealistic for them to accomplish. Separating the requirements for the small, hobby breeder from those of the large kennel establishments would address this issue more directly. Imposing a reasonable litter limit (i.e., 3-4 litters per year) might help to define a "hobby" breeder and provide a basis for the exemptions.

I support the efforts to bring the Pennsylvania puppy mills into compliance with the law. These organizations need to be stopped, or at best, reformed. However, I would hope that this could be

accomplished without hurting the small businesses already in operation in Pennsylvania that are not abusive, neglectful or exploitative. If not, I will be purchasing my next puppy in Vermont.

Sincerely,

A handwritten signature in cursive script that reads "Karen Schelling". The signature is written in black ink and is positioned to the right of the typed name.

Karen Schelling