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INDEPENDENT REGULATORY
REVIEW COMMISSION

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

February 14, 2007

Dear Ms. Bender,

I am writing to comment on the proposed amendments to the Pennsylvania dog law regulations issued on Dec.16, 2006. The new regulations seem to be written for large commercial establishments and only large commercial kennels could ever hope to meet some of these outrageous requirements. Some that I have been made aware of are:

- **All surfaces** the dog comes in contact with must be impervious to water. (no bedding allowed?)
- There must be a ventilation system that provides at least **6 air changes per hour**.(even in a house!)
- There must be a minimum of 10 foot-candles of light in housing areas **at all times**. All night?
- Records must be kept of the **date and time** when **each dog's** water and food dish is sanitized and refilled.
- Records must be kept of the **date, time and manner** in which **each dog** is exercised daily.
- Records must be kept of **all walls and floors** being "sanitized" once **every 24 hours**. (even a house)
- Dogs under 35 pounds may not be allowed with dogs over 35 pounds. (even if requested)
- Puppies can no longer be raised in homes due to possibly being on carpeting or outside on grass. (not allowed)

These do not sound like good "home-like" conditions to me, but more like keeping laboratory animals.

I **do believe** that inhumane and substandard kennel conditions should not be tolerated. I **do not agree** that most of the proposed changes are needed, or would even be necessary if the current laws were enforced. I also understand that the Bureau has virtually conceded that its current regulations have not been adequately enforced. I read that PA has some of the toughest dog law on the books. Many of these pending rules would also be setting precedents that could have far reaching affects.

I therefore urge that this proposal be withdrawn.

Sincerely,

