

Attn: Ms. Mary Bender
Pennsylvania Department of Agriculture
2301 North Cameron Street
Harrisburg, PA 17110-9408

Dear Ms. Bender:

As a dog owning voter, I want to go on record as opposing the **NEW** Pennsylvania Kennel Regulations.

My name is William E Weasner, Jr. and I live with my wife in the Kunkletown, PA area:

William and Jania Weasner
P.O Box 328
Kunkletown, PA 18058-0328

My wife and I work as teacher assistants for "special needs students" (not a highly paid position, but with certain non-monetary rewards). We leave our well-mannered dog at Trifecta Kennels every school day to avoid the psychological trauma (for the dog) of separation anxiety and to socialize the dog. He is eager to go to the kennel in the morning and eager to return to his/our home in the evening. The care and attention he gets at our local kennel (Trifecta Kennels) is excellent! He is taken out and allowed to run in a fenced "Dog Park" with his peers (his "Pack") under supervision everyday. As a result he returns home at ease and with a positive, friendly attitude toward other dogs and people. At some time in the future we may want to breed him as a non-commercial venture to form our own two or three dog "Pack" of very special dogs and companions. Moose is a loved member of our family.

I am writing to comment on the proposed amendments to the Pennsylvania dog law regulations issued on December 16, 2006. I believe that inhumane and substandard kennel conditions should not be tolerated, but **I do not agree** that most of the proposed regulatory changes are needed, or would necessarily have a beneficial outcome if adopted. Many are impractical, excessively burdensome and costly, unenforceable, and/or will not improve the quality of life for the dogs in these kennels. Correct enforcement of the existing laws would virtually eliminate all problem areas. If enforcement is under-financed, then increase the budget. It would be less expensive than the proposed changes.

Examples of problems with the proposal are the following:

- * The proposals pertaining to housing and social interaction of dogs of different sizes are contrary to good husbandry, socialization and training practices. (The staff at Trifecta considers our dog to be one of the happiest most well-adjusted and mannerly dogs for whose care they are responsible. Because of the mixed size/breed socialization he receives, he gets along well with virtually all dogs.)
- * 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. (I cannot afford to recreate a "mini" commercial standard kennel, but the care I provide far outstrips what a kennel could provide.)
- * The definition of "temporary housing" would require thousands of small residential hobby and show-breeding households to become licensed which could not possibly comply with the regulations, and which there is no reason to regulate.

* There is no scientific or accepted husbandry basis for the amended space and exercise requirements. (Here, proof should be the motivating reason, not "emotion".)

* 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.**

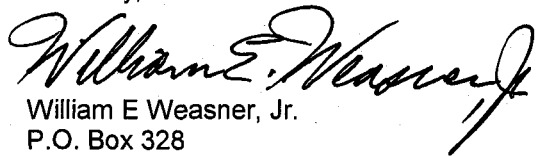
* The record keeping requirements with respect to exercise, cleaning, and other aspects of kennel management are excessively burdensome and serve no useful purpose, as it would be impossible to verify their accuracy in all but the most egregious circumstances. Such egregious circumstances already violate existing regulations. (Records can be, and are faked. Increasing the volume of records maintained does not improve their accuracy or effectiveness. The proposal would increase documentation costs without providing benefit.)

The above is far from a complete list of the deficiencies with the proposed regulations. I also 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. Correct enforcement of the existing laws is what is needed not additional poorly conceived laws.

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 with no basis in science or accepted canine husbandry practices. I urge that this proposal be withdrawn.

Sincerely,



William E Weasner, Jr.
P.O. Box 328
Kunkletown, PA 18058-0328

Cc: Senator Patrick M. Browne, Michael K. Hanna-Chairman Agriculture Affairs, Ms. Mary Bender-Bureau of Dog Law Enforcement, Mr. Mike Carroll-Legislator, Governor Edward G. Rendell