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RD#3 Box 102A  
Towanda, PA 18848  
February 15, 2006

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2007 FEB 28 PM 2: 43

INDEPENDENT REGULATORY  
REVIEW COMMISSION

Dear Ms. Mary Bender,

I am writing to comment on the proposed amendments to the PA Dog Law regulations issued on Dec. 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 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.

Some proposed amendments miss their mark. They punish responsible, law-abiding citizens in an effort to deal with the irresponsible and lawless.

Smaller breeders and dog owners who maintain their dogs in their own residences may not be able to comply with the rigid kennel regulations, yet provide care and conditions far superior to those required by the proposed new standards.

The record keeping requirements with respect to exercise, cleaning, and other aspects of kennel management are excessively burdensome--and serve no useful purpose. It would be impossible to verify the accuracy of these records.

The limiting of the number of pets does not guarantee better care. One or two animals can be neglected--it is the owners own rules that dictate this. In general, a communities own animal control officer could verify data that would show owners of more that the designated limit of animals are not on record for citing of animal cruelty.

The proposed addition of 8 personnel to constitute a "swat team" of enforcement seems appalling in a time when Gov. Rendell is raising the state tax to keep our State solvent. This would increase not only state salaries, but expenses and benefits as well.

The Bureau has conceded that its current regulations have not been adequately enforced . It should cite these specific deficiencies and propose changes based them. The current list of proposals seems to be no more than a shopping list of ideas to improve environments for dogs, not the improvement of specific instances in which the welfare of dogs could not be protected.

For these reasons, and many more, I urge that this **proposal be withdrawn**. I ask those currently considering pet limit laws to **listen to the counterproposals** being offered; and to allow **representation of members from dog clubs** to be a part of the regulation-making process.

Sincerely concerned,

Connie Craig

RE: Dog Law House Bill #397  
Changes: 7 PA Code CHS 21,23, 25, &27