

2559

Independent Regulatory Review Commission
Attn: Arthur Coccodrilli, Chairman
333 Market Street, 14th Floor
Harrisburg, PA 17101

RECEIVED
2007 FEB 15 AM 11:08
INDEPENDENT REGULATORY
REVIEW COMMISSION

January 31, 2007

Dear Chairman Coccodrilli,

I am writing to comment on the proposed amendments to the Dog Law Regulations Act 225 issued on December 16, 2006. I personally think that many of the changes are impractical and burdensome, and will not improve the quality of life for dogs in kennels.


The proposed regulations will require a substantial increase in manpower with many hours dedicated to filling out bureaucratic reports or recordkeeping which the department already has.

Kennels have been custom built to comply with Pennsylvania Department of Agriculture's Dog Law Enforcement standards that were based on USDA Standards. The proposed changes of this section will require the demolition of Pennsylvania's licensed and inspected kennels and the rebuilding of entirely new dimensioned kennels. There is no scientific basis for the change; the average cost per kennel will be between \$30,000.00 and \$500,000.00 each.

The current proposed appears to be over idealistic in term of improving the welfare of dogs. I urge that this proposal be rescinded and an approach similar to the USDA standards be developed.

Yours truly,

Bridget A Rhoads



Rhoads Kennel
41 Summer Mountain Road
Bernville, PA 19506

2559

Independent Regulatory Review Commission
Attn: Arthur Coccodrilli, Chairman
333 Market Street, 14th Floor
Harrisburg, PA 17101

January 22, 2007

RECEIVED
2007 FEB 15 AM 11:08
INDEPENDENT REGULATORY
REVIEW COMMISSION

RE: Proposed Changes to PA Dog Law Regulations (36 Pa. B. 7596)

Dear Chairman Coccodrilli,

I am writing in response to the proposed amendments to the Dog Law Act 225 which was issued on December 16, 2006.

The current proposed regulation changes have appeared to be burdensome and beyond rulemaking. The proposals add completely new categories and definition to the existing laws. These changes must be addressed through the legislative process.

The proposals referencing housing and social interaction of dogs of different sizes are contrary to good husbandry, socializing and training practices. Furthermore, there is no scientific or accepted husbandry basis for the amended space and exercise requirements.

In addition, the proposed regulations call for the temperature of the kennel floor to be 50F° in the warm weather. Many kennels are air conditioned to a comfortable 70F°. A dog sleeping on a 50F° floor can develop hypothermia and become ill or die. For temperature, lighting, cleaning, exercise, housing, and veterinary care, the attending veterinarian should set forth and approve procedures specific for the kennel buildings and breeds of dogs.

The proposed changes above will require Pennsylvania's licensed and inspected kennels to be demolished and rebuilt. The average cost will be between \$30,000.00 and \$500,000.00 per kennel, if the proposed laws are adopted.

The current proposed appears to be over idealistic in term of improving the welfare of dogs. I urge that this proposal be rescinded and an approach similar to the USDA standards be developed.

Yours sincerely, *Alex Wadel*

Alex Wadel
24581 Back Rd
Concord, PA 17217

Independent Regulatory Review Commission
Attn: Arthur Coccodrilli, Chairman
333 Market Street, 14th Floor
Harrisburg, PA 17101

January 22, 2007

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Yours sincerely, *Cathy Wadel*

Cathy Wadel
24581 Back Rd
Concord, PA 17217

RECEIVED
2007 FEB 15 AM 11:09
INDEPENDENT REGULATORY
REVIEW COMMISSION

2559

RECEIVED
2007 FEB 15 AM 11:15
INDEPENDENT REGULATORY
REVIEW COMMISSION
February 1, 2007

Independent Regulatory Review Commission
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Harrisburg, PA 17101

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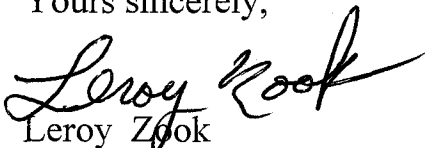
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Yours sincerely,



Leroy Zook
97 Green Burr Gap rd
Rebersburg, PA 16872

GIDDEON S. KING
274 CENTER SQUARE ROAD
LEOLA, PA 17540

2559

Independent Regulatory Review Commission
Attn: Arthur Coccodrilli, Chairman
333 Market Street, 14th Floor
Harrisburg, PA 17101

January 23, 2007

INDEPENDENT REGULATORY
REVIEW COMMISSION

2007 FEB 15 AM 11:15

RECEIVED

Dear Chairman Coccodrilli,

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The proposed regulations call for kennels to be specific in regard to exercise and cleaning records. These would require a substantial increase in manpower and time dedicated to filling out written bureaucratic reports, it would be impossible to verify their accuracy. This change would also divert the small business owner's time away from caring for their animals.

The bureau already requires the name, address, acquisition date, disposition date, type of sale, breed, sex, color, whelping date, and identification number be recorded for each and every dog sold, transferred, adopted, or given away. If the department wishes to enforce the law, they already have all information needed.

Unless the kennel has purchased, sold, or transferred more than 26 dogs in a calendar year to the individual, it is impossible for the kennel to know if the individual is required to have a Pennsylvania kennel license.

Additionally, kennels have been custom built to comply with the Department of Agriculture's Dog Law Enforcement standards that were based on USDA standards. The proposed changes of this section will require the demolition of licensed and inspected kennels and the rebuilding of entirely new dimensioned kennels. The average cost per kennel will be between \$30,000.00 and \$500,000.00 each.

I sincerely urge that this proposal be rescinded and the USDA standard be adopted in Pennsylvania.

Yours Sincerely,

Gideon S. King

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

January 31, 2007

Dear Ms. Bender,

I am writing to comment on the proposed amendments to the Dog Law Regulations Act 225 issued on December 16, 2006. I personally think that many of the changes are impractical and burdensome, and will not improve the quality of life for dogs in kennels.

The proposed regulations will require a substantial increase in manpower with many hours dedicated to filling out bureaucratic reports or recordkeeping which the department already has.

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Yours truly,

Rockvale Kennels

Rockvale Kennels
100 Hartman Bridge Rd
Ronks, PA 17572

INDEPENDENT REGULATORY
REVIEW COMMISSION

2007 FEB 15 AM 10:59

RECEIVED

Sarah Ann Martin
Dreisbach Church Road
Lewisburg, PA 17837

January 30, 2007

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

INDEPENDENT REGULATORY
REVIEW COMMISSION

2007 FEB 15 AM 10:58

RECEIVED

Dear Ms. Bender,

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The proposed regulations call for kennels to be specific in regard to exercise and cleaning records. These would require a substantial increase in manpower and time dedicated to filling out written bureaucratic reports, and it would be impossible to verify their accuracy. This change would also divert the small business owner's time away from caring for their animals.

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Yours Sincerely,

Sarah Ann Martin

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

January 31, 2007

Dear Ms. Bender,

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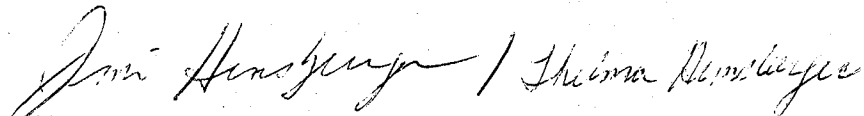
The proposed changes would require the kennel owner to record every time a water bowl or food pan is washed, every time the primary and secondary pen enclosures are cleaned, the feeding and watering dates and times, etc. These excessive and burdensome requirements will require a substantial increase in manpower with many hours dedicated to filling out written bureaucratic reports and divert the small business owner's time away from caring for their animals.

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The proposed changes make no sense for all kennel owners' dogs to be seized by the Dog Law Bureau based on the Governor's proposed new requirements for pen sized or quarantine regulations. Dog Law places the same dog into a humane society not required to have the proposed new standards. It is vital to have fair and uniform kennel requirements. In addition, small business owners are affected greatly and their due process rights in court are limited if the proposed changes adopted.

I sincerely urge that this proposal be rescinded.

Yours Sincerely,



Jim Hunsberger
Rd 1 Box 154
Mt Pleasant Mills, PA 17853

INDEPENDENT REGULATORY
REVIEW COMMISSION

2007 FEB 15 AM 10:58

RECEIVED

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

January 31, 2007

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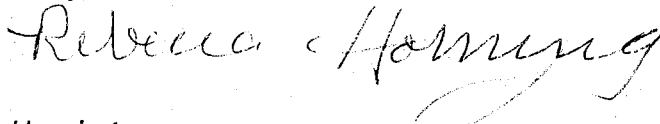
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I sincerely urge that this proposal be rescinded.

Yours Sincerely,



Rebecca Horning
1647 Union Grove Rd
East Earl, PA 17519

INDEPENDENT REGULATORY
REVIEW COMMISSION

2007 FEB 15 AM 10:56

RECEIVED

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

RECEIVED
2007 FEB 1 10 56
INDEPENDENT REGULATORY
REVIEW COMMISSION
January 31, 2007

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Yours sincerely,



Edna Zimmerman
25 Hickory Lane
Ephrata, PA 17522

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

RECEIVED
2007 FEB 1 AM 10:52
INDEPENDENT REGULATORY
COMMISSION
January 31, 2007

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Yours sincerely,

Allen B. Zimmerman
343 Reidenbach Road
New Holland, PA 17557

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

INDEPENDENT REGULATORY
REVENUE COMMISSION

2007 FEB 15 AM 10:56

RECEIVED

January 31, 2007

Dear Ms. Bender,

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I sincerely urge that this proposal be rescinded.

Yours Sincerely,

Louise Horning

Louise Horning
2140 Mensch Rd
Mifflinburg, PA 17844

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

January 22, 2007

INDEPENDENT REGULATORY
COMMISSION

2007 FEB 15 AM 10:55

RECEIVED

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Yours sincerely,



Buddy Walk
185 Mulholton Dr.
Tyrone, PA 16686

Mar-Jo Kennel
900 Unger Lane
Boyertown, PA 19512

January 30, 2007

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

INDEPENDENT REGULATORY
REVIEW COMMISSION

2007 FEB 15 AM 10:54

RECEIVED

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I sincerely urge that this proposal be rescinded and the USDA standard be adopted in Pennsylvania.

Yours Sincerely,

2559

INDEPENDENT REGULATORY
REVIEW COMMISSION

2007 FEB 15 AM 11:06

RECEIVED

Independent Regulatory Review Commission
Attn: Arthur Coccodrilli, Chairman
333 Market Street, 14th Floor
Harrisburg, PA 17101

January 23, 2007

Dear Chairman Coccodrilli,

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I sincerely urge that this proposal be rescinded.

Yours Sincerely,



Goliath's Paw Doggie Daycare
4 Bainbridge St.
Marietta, PA 17547

Independent Regulatory Review Commission
Attn: Arthur Coccodrilli, Chairman
333 Market Street, 14th Floor
Harrisburg, PA 17101

January 31, 2007

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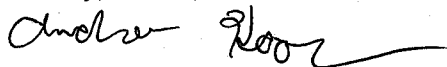
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I sincerely urge that this proposal be rescinded.

Yours Sincerely,



Andrew Hoover
6471 Park Rd.
Orrstown, PA 17244

RECEIVED

2007 FEB 15 AM 11: 7

INDEPENDENT REGULATORY
REVIEW COMMISSION

2559

Independent Regulatory Review Commission
Attn: Arthur Coccodrilli, Chairman
333 Market Street, 14th Floor
Harrisburg, PA 17101

RECEIVED
2007 FEB 5 AM 11:00
INDEPENDENT REGULATORY
REVIEW COMMISSION
February 1, 2007

Dear Chairman Coccodrilli,

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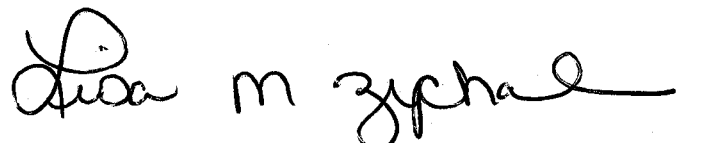
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Yours sincerely,

Lisa M Zychal
75 N Sheridan Rd
Newmanstown, PA 17073


HEALTHY PAWS IROC
610-693-8222

January 31, 2007

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

INDEPENDENT REGULATORY
RELIEF COMMISSION
2007 FEB 15 AM 11:01

RECEIVED

Dear Ms. Bender:

Having purchased dogs from wonderful, ethical, breeders and boarded them in clean, air conditioned/heated boarding kennels, owned and operated by animal loving, ethical professionals, I feel compelled to voice my opinion.

Although, perhaps, well intentioned, the proposed amendments of December 16, 2006 to the Pennsylvania Dog Law Regulations greatly concern me.

I agree that inhumane and substandard kennel conditions should not be tolerated, however, I emphatically disagree with the proposed regulatory changes.

I believe these changes are impractical, will create a great burden from a financial standpoint, will not be enforceable and, most importantly, will not improve the quality of the lives of the dogs entrusted to the aforementioned, ethical breeders and boarding kennels.

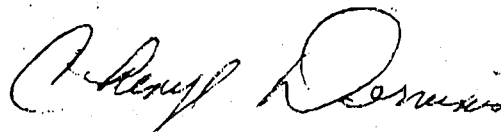
These regulations will also require wholesale renovation, if not rebuilding of many kennels already built in compliance with current federal and/or state standards. Small, boarding kennels, and breeding facilities, whose care and conditions are far superior to those required by the proposed new standards, would be unable to comply with the rigid commercial kennel standards.

These small breeders and boarding kennels would be forced out of business, face a loss of income, and deprive their communities of their outstanding services.

I strongly urge that this proposal be withdrawn

no address

Sincerely,



January 31, 2007

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

Dear Ms. Bender:

Having purchased dogs from wonderful, ethical, breeders and boarded them in clean, air conditioned/heated boarding kennels, owned and operated by animal loving, ethical professionals, I feel compelled to voice my opinion.

Although, perhaps, well intentioned, the proposed amendments of December 16, 2006 to the Pennsylvania Dog Law Regulations greatly concern me.

I agree that inhumane and substandard kennel conditions should not be tolerated, however, I emphatically disagree with the proposed regulatory changes.

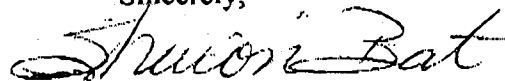
I believe these changes are impractical, will create a great burden from a financial standpoint, will not be enforceable and, most importantly, will not improve the quality of the lives of the dogs entrusted to the aforementioned, ethical breeders and boarding kennels.

These regulations will also require wholesale renovation, if not rebuilding of many kennels already built in compliance with current federal and/or state standards. Small, boarding kennels, and breeding facilities, whose care and conditions are far superior to those required by the proposed new standards, would be unable to comply with the rigid commercial kennel standards.

These small breeders and boarding kennels would be forced out of business, face a loss of income, and deprive their communities of their outstanding services.

I strongly urge that this proposal be withdrawn

Sincerely,



no address

INDEPENDENT REGULATORY
REVIEW COMMISSION

2007 FEB 15 AM 11:02

RECEIVED

January 31, 2007

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

INDEPENDENT REGULATORY
REVIEW COMMISSION

2007 FEB 15 AM 11:01

RECEIVED

Dear Ms. Bender:

Having purchased dogs from wonderful, ethical, breeders and boarded them in clean, air conditioned/heated boarding kennels, owned and operated by animal loving, ethical professionals, I feel compelled to voice my opinion.

Although, perhaps, well intentioned, the proposed amendments of December 16, 2006 to the Pennsylvania Dog Law Regulations greatly concern me.

I agree that inhumane and substandard kennel conditions should not be tolerated, however, I emphatically disagree with the proposed regulatory changes.

I believe these changes are impractical, will create a great burden from a financial standpoint, will not be enforceable and, most importantly, will not improve the quality of the lives of the dogs entrusted to the aforementioned, ethical breeders and boarding kennels.

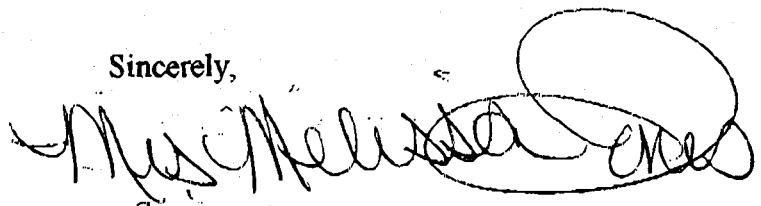
These regulations will also require wholesale renovation, if not rebuilding of many kennels already built in compliance with current federal and/or state standards. Small, boarding kennels, and breeding facilities, whose care and conditions are far superior to those required by the proposed new standards, would be unable to comply with the rigid commercial kennel standards.

These small breeders and boarding kennels would be forced out of business, face a loss of income, and deprive their communities of their outstanding services.

I strongly urge that this proposal be withdrawn

no address

Sincerely,



Brookside Kennels
141 Anderson Rd
Tunkhannock, PA 18657

2559

January 31, 2007

Independent Regulatory Review Commission
Attn: Arthur Coccodrilli, Chairman
333 Market Street, 14th Floor
Harrisburg, PA 17101

Dear Chairman Coccodrilli,

I am writing in opposition to the proposed changes to the Dog Law Act 225 which was issued on December 16, 2006. I completely understand that substandard kennel conditions should not be permitted, but most of the proposed regulatory changes are impractical and costly.

These proposals call for change in definitions and requirements of licensed and inspected kennels within the Commonwealth. These extensive changes must go through Pennsylvania's House and Senate legislative processes.

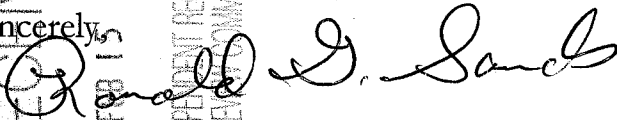
The proposed regulations call for the temperature of the kennel floor to be 50F° in the warm weather. Many kennels are air conditioned to a comfortable 70F°. A dog sleeping on a 50F° floor can develop hypothermia and become ill or die. For temperature, lighting, cleaning, exercise, housing, and veterinary care, the attending veterinarian should set forth and approve procedures specific for the kennel buildings and breeds of dogs.

Kennels have been custom built to comply with the Department of Agriculture's Dog Law Enforcement standards that were based on USDA standards. The proposed changes of this section will require the demolition of licensed and inspected kennels and the rebuilding of entirely new dimensioned kennels. The average cost per kennel will be between \$30,000.00 and \$500,000.00 each.

The proposed changes would require a substantial increase in manpower with many hours dedicated to filling out written bureaucratic reports and divert the small business owner's time away from caring for their animals.

I sincerely urge that this proposal be rescinded and the USDA standard be adopted in Pennsylvania.

Sincerely,


RECEIVED
2007 FEB 13 AM 10:00
INDEPENDENT REGULATORY
REVIEW COMMISSION

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

2007 FEB 15 AM 11:01
INDEPENDENT REVIEW COMMISSION
RECEIVED

Dear Ms. Bender:

My name is Ginny Frisch and I'm a small breeder. I would like 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.

* 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. I would have to move, because I can't have a kennel license in my community. Kennels are not allowed.

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

Sincerely yours,

Ginny Frisch

no address

2559

Independent Regulatory Review Commission
Attn: Arthur Coccodrilli, Chairman
333 Market Street, 14th Floor
Harrisburg, PA 17101

January 27, 2007

Dear Chairman Coccodrilli,

I am writing in response to the Dog Law Act 225 that was issued on December 16, 2006, of which I have several disagreements. The regulatory proposals in general are very difficult and costly to enforce, extremely onerous, and not feasible when put in to practice.

The new proposal only permits a licensed kennel to buy from another licensed kennel. This is fraud for the following reasons:

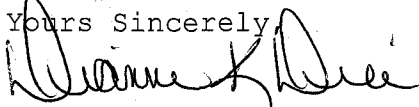
1. Unless the kennel has purchased, sold, or transferred more than 26 dogs in a calendar year to the individual, it is impossible for the kennel to know if the individual is required to have a Pennsylvania kennel license.
2. It is unlawful for the department to regulate and inspect kennels outside of Pennsylvania.
3. The Pennsylvania Department of Agriculture Dog Law Enforcement Bureau already requires the name, address, acquisition date, disposition date, type of sale, breed, sex, color, whelping date, and identification number be recorded for each and every dog sold, transferred, adopted, or given away. If the Department wishes to enforce the law, they already have all information needed.

The proposals referencing to housing and social interaction of dogs of different sizes are contrary to good husbandry, socializing and training practices. Moreover, there is no scientific or accepted husbandry basis for the amended space and exercise requirements.

The current proposal claims to be a general list of ideas to improve the breeding environment for dogs, which are neither substantiated by science nor attributed as accepted canine husbandry practices. A better idea would be for Pennsylvania to adopt USDA type standards.

I sincerely request that this proposal be withdrawn.

Yours Sincerely



DianneDice
RD #1, Box 125
Fredericksburg, PA 17026

RECEIVED
2007 FEB 15 AM 11:00
INDEPENDENT REGULATORY
REVIEW COMMISSION

Independent Regulatory Review Commission
Attn: Arthur Coccodrilli, Chairman
333 Market Street, 14th Floor
Harrisburg, PA 17101

2559

INDEPENDENT REGULATORY
REVIEW COMMISSION

2007 FEB 15 AM 11:11

RECEIVED

January 26, 2007

Dear Chairman Coccodrilli,

I am writing in response to the Dog Law Act 225 that was issued on December 16, 2006, of which I have several disagreements. The regulatory proposals in general are very difficult and costly to enforce, extremely onerous, and not feasible when put in to practice.

The new proposal only permits a licensed kennel to buy from another licensed kennel. This is fraud for the following reasons:

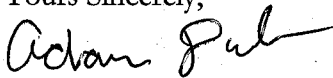
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The current proposal claims to be a general list of ideas to improve the breeding environment for dogs, which are neither substantiated by science nor attributed as accepted canine husbandry practices. A better idea would be for Pennsylvania to adopt USDA type standards.

I sincerely request that this proposal be withdrawn.

Yours Sincerely,



AdamDaub
1380 Pine Grove Road
Fredericksburg, PA 17026

2559

Independent Regulatory Review Commission
Attn: Arthur Coccodrilli, Chairman
333 Market Street, 14th Floor
Harrisburg, PA 17101

January 26, 2007

Dear Chairman Coccodrilli,

I am writing in response to the Dog Law Act 225 that was issued on December 16, 2006, of which I have several disagreements. The regulatory proposals in general are very difficult and costly to enforce, extremely onerous, and not feasible when put in to practice.

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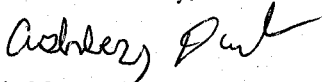
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The current proposal claims to be a general list of ideas to improve the breeding environment for dogs, which are neither substantiated by science nor attributed as accepted canine husbandry practices. A better idea would be for Pennsylvania to adopt USDA type standards.

I sincerely request that this proposal be withdrawn.

Yours Sincerely,



Ashley Daub
1380 Pine Grove Road
Fredericksburg, PA 17026

RECEIVED
2007 FEB 15 AM 11:12
INDEPENDENT REGULATORY
REVIEW COMMISSION

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

January 30, 2007

Dear Ms. Bender,

I am writing in response to the Dog Law Act 225 that was issued on December 16, 2006, of which I have several disagreements. The regulatory proposals in general are very difficult and costly to enforce, extremely onerous, and not feasible when put in to practice.

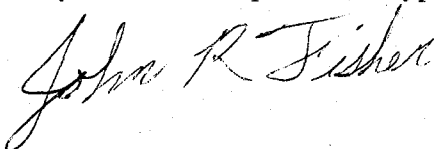
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The proposals referencing to housing and social interaction of dogs of different sizes are contrary to good husbandry, socializing and training practices. Moreover, there is no scientific or accepted husbandry basis for the amended space and exercise requirements.

The current proposal claims to be a general list of ideas to improve the breeding environment for dogs, which are neither substantiated by science nor attributed as accepted canine husbandry practices. A better idea would be for Pennsylvania to adopt USDA type standards. I sincerely request that this proposal be withdrawn.

Yours Sincerely,



John Fisher
2816-B North Cherry Lane
Ronks, PA 17572

RECEIVED
2007 FEB 15 AM 11:03
INDEPENDENT REGULATORY
REVIEW COMMISSION

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

January 30, 2007

Dear Ms. Bender,

I am writing in response to the Dog Law Act 225 that was issued on December 16, 2006, of which I have several disagreements. The regulatory proposals in general are very difficult and costly to enforce, extremely onerous, and not feasible when put in to practice.

The new proposal only permits a licensed kennel to buy from another licensed kennel. This is fraud for the following reasons:

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2. It is unlawful for the department to regulate and inspect kennels outside of Pennsylvania.
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The proposals referencing to housing and social interaction of dogs of different sizes are contrary to good husbandry, socializing and training practices. Moreover, there is no scientific or accepted husbandry basis for the amended space and exercise requirements.

The current proposal claims to be a general list of ideas to improve the breeding environment for dogs, which are neither substantiated by science nor attributed as accepted canine husbandry practices. A better idea would be for Pennsylvania to adopt USDA type standards. I sincerely request that this proposal be withdrawn.

Yours Sincerely,

AlvinFlaud
71 Rock Rd
Honey Brook, PA 19344

RECEIVED
2007 FEB 15 AM 10:59
INDEPENDENT REGULATORY
REVIEW COMMISSION

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

January 30, 2007

Dear Ms. Bender,

I am writing in response to the Dog Law Act 225 that was issued on December 16, 2006, of which I have several disagreements. The regulatory proposals in general are very difficult and costly to enforce, extremely onerous, and not feasible when put in to practice.

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The current proposal claims to be a general list of ideas to improve the breeding environment for dogs, which are neither substantiated by science nor attributed as accepted canine husbandry practices. A better idea would be for Pennsylvania to adopt USDA type standards. I sincerely request that this proposal be withdrawn.

Yours Sincerely,



John Firestine
925 East Clay Street
Shamokin, PA 17872

RECEIVED
2007 FEB 15 AM 10:55
INDEPENDENT REGULATORY
REVIEW COMMISSION

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

January 30, 2007

Dear Ms. Bender,

I am writing in response to the Dog Law Act 225 that was issued on December 16, 2006, of which I have several disagreements. The regulatory proposals in general are very difficult and costly to enforce, extremely onerous, and not feasible when put in to practice.

The new proposal only permits a licensed kennel to buy from another licensed kennel. This is fraud for the following reasons:

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The proposals referencing to housing and social interaction of dogs of different sizes are contrary to good husbandry, socializing and training practices. Moreover, there is no scientific or accepted husbandry basis for the amended space and exercise requirements.

The current proposal claims to be a general list of ideas to improve the breeding environment for dogs, which are neither substantiated by science nor attributed as accepted canine husbandry practices. A better idea would be for Pennsylvania to adopt USDA type standards. I sincerely request that this proposal be withdrawn.

Yours Sincerely,

Elmer Fisher

Elmer Fisher
100 Hartman Bridge Rd
Ronks, PA 17572

INDEPENDENT REGULATORY
REVIEW COMMISSION

2007 FEB 15 AM 10:58

RECEIVED

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

January 30, 2007

Dear Ms. Bender,

I am writing in response to the Dog Law Act 225 that was issued on December 16, 2006, of which I have several disagreements. The regulatory proposals in general are very difficult and costly to enforce, extremely onerous, and not feasible when put in to practice.

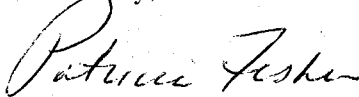
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The proposals referencing to housing and social interaction of dogs of different sizes are contrary to good husbandry, socializing and training practices. Moreover, there is no scientific or accepted husbandry basis for the amended space and exercise requirements.

The current proposal claims to be a general list of ideas to improve the breeding environment for dogs, which are neither substantiated by science nor attributed as accepted canine husbandry practices. A better idea would be for Pennsylvania to adopt USDA type standards. I sincerely request that this proposal be withdrawn.

Yours Sincerely,



Fishers Kennel
723 N. Lancaster St
Jonestown, PA 17038

RECEIVED
2007 FEB 15 AM 10:53
INDEPENDENT REGULATORY
REVIEW COMMISSION

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

INDEPENDENT REGULATORY
FEEDBACK COMMISSION

2007 FEB 15 AM 10:56

RECEIVED

January 22, 2007

Dear Ms. Bender,

I am writing in response to the Dog Law Act 225 that was issued on December 16, 2006, of which I have several disagreements. The regulatory proposals in general are very difficult and costly to enforce, extremely onerous, and not feasible when put in to practice.

The new proposal only permits a licensed kennel to buy from another licensed kennel. This is fraud for the following reasons:

1. Unless the kennel has purchased, sold, or transferred more than 26 dogs in a calendar year to the individual, it is impossible for the kennel to know if the individual is required to have a Pennsylvania kennel license.
2. It is unlawful for the department to regulate and inspect kennels outside of Pennsylvania.
3. The Pennsylvania Department of Agriculture Dog Law Enforcement Bureau already requires the name, address, acquisition date, disposition date, type of sale, breed, sex, color, whelping date, and identification number be recorded for each and every dog sold, transferred, adopted, or given away. If the Department wishes to enforce the law, they already have all information needed.

The proposals referencing to housing and social interaction of dogs of different sizes are contrary to good husbandry, socializing and training practices. Moreover, there is no scientific or accepted husbandry basis for the amended space and exercise requirements.

The current proposal claims to be a general list of ideas to improve the breeding environment for dogs, which are neither substantiated by science nor attributed as accepted canine husbandry practices. A better idea would be for Pennsylvania to adopt USDA type standards.

I sincerely request that this proposal be withdrawn.

Yours Sincerely,



Keith E Wadel
24581 Back Rd
Concord, PA 17217

2559

January 18, 2007

Independent Regulatory Review Commission
Attn: Arthur Coccodrilli, Chairman
333 Market Street, 14th Floor
Harrisburg, PA 17101

Dear Chairman Coccodrilli,

I am writing in response to the proposed amendments to the Dog Law Act 225 which was issued on December 16, 2006.

With a full understanding that the bureau is trying to improve substandard kennel conditions, I am not in agreement that most of the changes are necessary.

The proposed record keeping would require me to write down the date and time I washed each food and water bowl, every time a pen is cleaned; each individual outside run is cleaned, etc. It would be better for me to have my general daily procedures that I routinely follow, in writing. This is similar to how the USDA regulations are worded.

The proposed changes would also require the demolition of Pennsylvania's licensed and inspected kennels. Yet, there is no scientific basis for the change. In addition, the average cost to rebuild kennel will be between \$30,000.00 and \$500,000.00 each.

I sincerely urge that this proposal be withdrawn, as the beneficial outcome will be in question if the proposal is adopted.

Yours truly,

Keith Wadel

RECEIVED

2007 FEB 15 AM 11:00

INDEPENDENT REGULATORY
REVIEW COMMISSION

2559

Independent Regulatory Review Commission
Attn: Arthur Coccodrilli, Chairman
333 Market Street, 14th Floor
Harrisburg, PA 17101

RECEIVED
2007 FEB 15 AM 11:10
INDEPENDENT REGULATORY
REVIEW COMMISSION

January 31, 2007

Dear Chairman Coccodrilli,

I am writing to express a few concerns that I have with regard to the proposed Dog Law Act 225, which was issued on December 16, 2006.

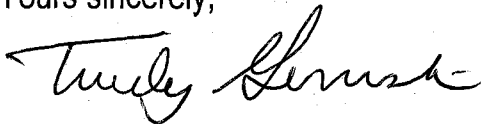
I appreciate that fact that the bureau has helped to improve the dog laws in the past several years. However, the current proposed regulation changes have appeared to be intentionally burdensome and go far beyond mere rulemaking.

The proposals add completely new categories and definition. These changes must be addressed through the legislative process.

The proposed changes require the kennel owner to record every time a water bowl or food pan is washed, every time the primary and secondary pen enclosures are cleaned, and the feeding and watering dates and times, etc. All these burdensome and excessive requirements will require a substantial increase in manpower with many hours dedicated to filling out written bureaucratic reports and divert the small business owner's time away from caring for their animals.

The Departments direction and intentions are neither attributed as accepted canine husbandry practices nor substantiated by science. The Department should base their changes on education to improve the industry. I request that this proposal be withdrawn.

Yours sincerely,



The Pet Dome
North Franklin St.
Bloomsburg, PA 17815

see attachment:

No Name
57 Mt. View Road Rd 1
Strausstown, PA 19559

January 30, 2007

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

INDEPENDENT REGULATORY
REVIEW COMMISSION

2007 FEB 15 AM 10:59

RECEIVED

Dear Ms. Bender,

I am writing in response to the proposed amendments to the Dog Law Act 225 which was issued on December 16, 2006.

With a full understanding that the bureau is trying to improve substandard kennel conditions, I am not in agreement that most of the changes are necessary.

The proposed record keeping would require me to write down the date and time I washed each food and water bowl, every time a pen is cleaned; each individual outside run is cleaned, etc. It would be better for me to have my general daily procedures that I routinely follow, in writing. This is similar to how the USDA regulations are worded.

The proposed changes would also require the demolition of Pennsylvania's licensed and inspected kennels. Yet, there is no scientific basis for the change. In addition, the average cost to rebuild kennel will be between \$30,000.00 and \$500,000.00 each.

I sincerely urge that this proposal be withdrawn, as the beneficial outcome will be in question if the proposal is adopted.

Yours truly,

Charles Stoult

RECEIVED

2007 FEB 15 AM 10:57

INDEPENDENT REGULATORY
PERIOD COMMISSION

January 26, 2007

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

Dear Ms. Bender,

I am writing in response to the proposed amendments to the Dog Law Act 225 which was issued on December 16, 2006.

With a full understanding that the bureau is trying to improve substandard kennel conditions, I am not in agreement that most of the changes are necessary.

The proposed record keeping would require me to write down the date and time I washed each food and water bowl, every time a pen is cleaned; each individual outside run is cleaned, etc. It would be better for me to have my general daily procedures that I routinely follow, in writing. This is similar to how the USDA regulations are worded.

The proposed changes would also require the demolition of Pennsylvania's licensed and inspected kennels. Yet, there is no scientific basis for the change. In addition, the average cost to rebuild kennel will be between \$30,000.00 and \$500,000.00 each.

I sincerely urge that this proposal be withdrawn, as the beneficial outcome will be in question if the proposal is adopted.

Yours truly,

Aruda Mack
Lake Lab-Kennel

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

January 26, 2007

Dear Ms. Bender,

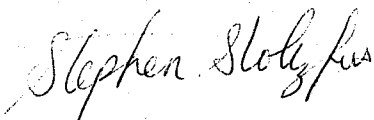
I am writing to express a few concerns that I have with regard to the proposed Dog Law Act 225, which was issued on December 16, 2006.

I appreciate that fact that the bureau has helped to improve the dog laws in the past several years. However, the current proposed regulation changes have appeared to be intentionally burdensome and go far beyond mere rulemaking. The proposals add completely new categories and definition. These changes must be addressed through the legislative process.

The proposed changes require the kennel owner to record every time a water bowl or food pan is washed, every time the primary and secondary pen enclosures are cleaned, and the feeding and watering dates and times, etc. All these burdensome and excessive requirements will require a substantial increase in manpower with many hours dedicated to filling out written bureaucratic reports and divert the small business owner's time away from caring for their animals.

The Departments direction and intentions are neither attributed as accepted canine husbandry practices nor substantiated by science. The Department should base their changes on education to improve the industry. I request that this proposal be withdrawn.

Yours sincerely,



Stephen Stoltzfus
5053 Brush Valley Road
Rebersburg, PA 16827

INDEPENDENT REGULATION
REVENUE COMMISSION

2007 FEB 15 AM 10:57

RECEIVED

Oak Bend Road Kennel
34 Oak Bend Rd
Newburg, PA 17240

January 30, 2007

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

INDEPENDENT REGULATORY
COMMISSION

2007 FEB 15 AM 10:57

RECEIVED

Dear Ms. Bender,

I am writing in response to the proposed amendments to the Dog Law Act 225 which was issued on December 16, 2006.

With a full understanding that the bureau is trying to improve substandard kennel conditions, I am not in agreement that most of the changes are necessary.

The proposed record keeping would require me to write down the date and time I washed each food and water bowl, every time a pen is cleaned; each individual outside run is cleaned, etc. It would be better for me to have my general daily procedures that I routinely follow, in writing. This is similar to how the USDA regulations are worded.

The proposed changes would also require the demolition of Pennsylvania's licensed and inspected kennels. Yet, there is no scientific basis for the change. In addition, the average cost to rebuild kennel will be between \$30,000.00 and \$500,000.00 each.

I sincerely urge that this proposal be withdrawn, as the beneficial outcome will be in question if the proposal is adopted.

Yours truly,

Reuben M. Zook

North Slope Kennels
303 Mill Rd
Ephrata, PA 17522

January 30, 2007

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

INDEPENDENT REGULATORY
REVIEW COMMISSION

2007 FEB 15 AM 10:56

RECEIVED

Dear Ms. Bender,

I am writing in response to the proposed amendments to the Dog Law Act 225 which was issued on December 16, 2006.

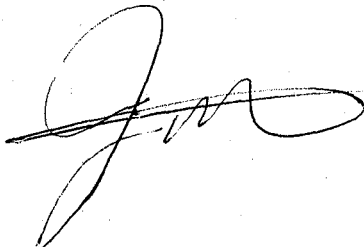
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I sincerely urge that this proposal be withdrawn, as the beneficial outcome will be in question if the proposal is adopted.

Yours truly,

A handwritten signature in black ink, appearing to be the initials 'J.M.' with a large, stylized flourish extending from the end.

North Slope Kennels
303 Mill Rd
Ephrata, PA 17522

January 30, 2007

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

INDEPENDENT REGULATORY
BOARD COMMISSION

2007 FEB 15 AM 10:56

RECEIVED

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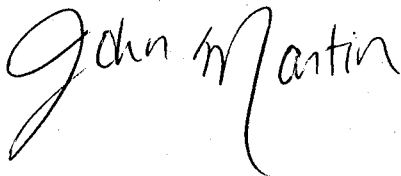
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Yours truly,



North Slope Kennels
303 Mill Rd
Ephrata, PA 17522

January 30, 2007

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

RECEIVED
2007 FEB 15 AM 10:56
INDEPENDENT REGULATORY
REVIEW COMMISSION

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I sincerely urge that this proposal be withdrawn, as the beneficial outcome will be in question if the proposal is adopted.

Yours truly,

Mary Martin

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

January 30, 2007

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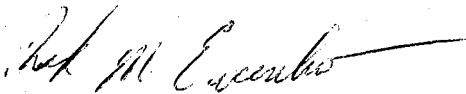
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The Departments direction and intentions are neither attributed as accepted canine husbandry practices nor substantiated by science. The Department should base their changes on education to improve the industry. I request that this proposal be withdrawn.

Yours sincerely,



Trachaven Kennel
6623 Blooming Grove Rd
Glenville, PA 17329

INDEPENDENT REGULATORY
REVIEW COMMISSION

2007 FEB 15 AM 10:56

RECEIVED

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

January 31, 2007

Dear Ms. Bender,

I am writing to express a few concerns that I have with regard to the proposed Dog Law Act 225, which was issued on December 16, 2006.

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Yours sincerely,

David D. Mast

The Mast's Kennel
141 Marshall Rd
Luthersburg, PA 15848

RECEIVED
2007 FEB 15 AM 10:55
INDEPENDENT REGULATORY
HEARING COMMISSION

Independent Regulatory Review Commission
 Attn: Arthur Coccodrilli, Chairman
 333 Market Street, 14th Floor
 Harrisburg, PA 17101

January 31, 2007

Dear Chairman Coccodrilli,

I am writing in response to the Dog Law Act 225 that was issued on December 16, 2006, of which I have several disagreements. The regulatory proposals in general are very difficult and costly to enforce, extremely onerous, and not feasible when put in to practice.

The new proposal only permits a licensed kennel to buy from another licensed kennel. This is fraud for the following reasons:

1. Unless the kennel has purchased, sold, or transferred more than 26 dogs in a calendar year to the individual, it is impossible for the kennel to know if the individual is required to have a Pennsylvania kennel license.
2. It is unlawful for the department to regulate and inspect kennels outside of Pennsylvania.
3. The Pennsylvania Department of Agriculture Dog Law Enforcement Bureau already requires the name, address, acquisition date, disposition date, type of sale, breed, sex, color, whelping date, and identification number be recorded for each and every dog sold, transferred, adopted, or given away. If the Department wishes to enforce the law, they already have all information needed.

The proposals referencing to housing and social interaction of dogs of different sizes are contrary to good husbandry, socializing and training practices. Moreover, there is no scientific or accepted husbandry basis for the amended space and exercise requirements.

The current proposal claims to be a general list of ideas to improve the breeding environment for dogs, which are neither substantiated by science nor attributed as accepted canine husbandry practices. A better idea would be for Pennsylvania to adopt USDA type standards.

I sincerely request that this proposal be withdrawn.

Yours Sincerely,

Lolias L. Sunday

Red Bud Kennels

RR 1 Box 235

Port Royal Pa 17082

RECEIVED
 2007 FEB 05
 INDEPENDENT REGULATORY REVIEW COMMISSION
 HARRISBURG, PA 17101

Independent Regulatory Review Commission
Attn: Arthur Coccodrilli, Chairman
333 Market Street, 14th Floor
Harrisburg, PA 17101

2559

INDEPENDENT REGULATORY
REVIEW COMMISSION

2007 FEB 15 AM 11:13

RECEIVED

January 26, 2007

Dear Chairman Coccodrilli,

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The current proposal claims to be a general list of ideas to improve the breeding environment for dogs, which are neither substantiated by science nor attributed as accepted canine husbandry practices. A better idea would be for Pennsylvania to adopt USDA type standards.

I sincerely request that this proposal be withdrawn.

Yours Sincerely,

Rose Brumgard

Crisken Kennel
2667 York Rd
Gettysburg, PA 17325

PS: I am in complete agreement with all the above statements and to add my own personal thoughts, I sincerely believe if Dog Law Act 225 goes through as written that it will not only do much harm to many innocent people but will be detrimental to the animals involved as well as the law enforcement Officers.

Rose Brumgard

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

INDEPENDENT REGULATORY
PENNY COMMISSION

2007 FEB 15 AM 10:55

RECEIVED

Re. Doc. No. 06-2452 Proposed Changes to the Dog Law

Dear Ms. Bender,

It has been brought to my attention the newly proposed amendments to the PA dog law regulations. As the owner of (a / several) companion dog (s), I am writing to express my concerns and opposition to the proposed changes.

I purchased my dog directly from a reputable breeder, not a pet shop or large-scale commercial kennel, because I wanted the best chance at getting a healthy dog with a good temperament. I wanted to know that my puppy had been exposed to a variety of normal household situations and was prepared to live the life of a family companion. By buying directly from a breeder, I was able to see the conditions in which my puppy was raised.

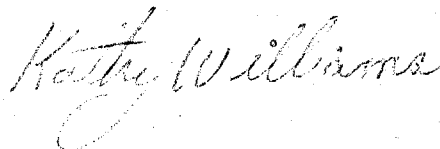
The proposed changes, particularly those applying to "Kennels- Primary Enclosures", are of particular concern to me. It is my understanding that in these proposed changes, if a cumulative total of 26 dogs are housed at "the Establishment" during a calendar year, then licensed breeders will be required to have housing facilities that comply with the specifications outlined in the proposed changes. Small scale breeders who fall into the class 1 designation, would no longer be able to maintain, breed, whelp or raise their dogs within their homes. These breeders, who strive to produce dogs which are true to breed type, of good temperament, and, inasmuch as possible, free from genetic disorders, would be forced to either restrict their numbers or build facilities to meet the standards.

I credit my dog's good temperament to thoughtful breeding and to the love and attention that my breeder gave my puppy. Most importantly, this included exposure to everyday sights and sounds, such as:

- 1) My puppy was taken outside to potty on grass regularly. This is of importance to me, as it helped with the housebreaking process.
- 2) In a home situation, my puppy was exposed to different surfaces and noises such as kitchen appliances, television and other noises that occur in my home.
- 3) My puppy was given opportunity to interact with other dogs, helping with social skills needed to meet other dogs we come in contact with.

While I applaud the efforts to improve the living conditions for the dogs and puppies being raised in commercial facilities, I find it a great disservice to the reputable breeder, who standards far surpass in many ways, what these proposed amendments mandate. I, for one, want the choice to buy from a small scale, reputable breeder, and oppose these amendments.

Sincerely,



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

Re. Doc. No. 06-2452

Dear Ms. Bender,

The breeder of my sheltie has brought to my attention the newly proposed dog law. As a person who cares very deeply about my beloved sheltie, I would like to express my concerns about these proposed changes.

I purchased my dog directly from a reputable breeder, not from a pet shop, shelter, or rescue because I wanted to know that my dog would have a good temperament and be healthy. Shelties have a reputation as being shy and noise sensitive. I wanted to know that my dog had been exposed to different situations and was prepared to live the life as a family pet. By purchasing directly from a breeder I was able to see the conditions the dog was raised in. My breeder raises her dogs in the house and works hard to provide the puppies with attention that builds confidence. I know this because my puppy was content from the day I brought him home and has been a valuable new member of the family.

Upon reading your proposed changes I am primarily concerned about the "Kennels-Primary Enclosures" portion of this proposal. It is my understanding that in these proposed changes, if a cumulative total of 26 dogs are housed at "the Establishment" during a calendar year, then licensed breeders will have to build housing quarters to meet the specifications outlined in these proposed changes.

I credit my dog's good temperament to the love and attention my breeder gave her puppies. Most importantly to me, this included constant exposure to everyday life noises, sights and sounds.

1. My puppy was taken outside to potty on grass regularly. This was important to me and helped my puppy with the housebreaking process
2. My puppy was socialized with other dogs and is comfortable in our neighborhood setting where he sees, meets, and plays with other dogs of various breeds daily.
3. In a home situation my puppy was exposed to television, radio, dish washer, clothes washer, drier, coffee machines, and many many other noises that occur regularly in my home.

While I applaud the efforts to improve the living conditions for those poor dogs who live in puppy mills, I feel it would be a greater service to those dogs to not allow "for profit" breeding to occur in the first place.

Sincerely,



RECEIVED
2017 FEB 15 AM 10:55
INDEPENDENT REGULATION
REVIEW COMMISSION

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

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Sincerely,

Charles A. Dalkiewicz
804 Norwich Ct.
Hbg. PA 17112

RECEIVED
2007 FEB 15 AM 10:38
INDEPENDENT REGULATORY
REVIEW COMMISSION

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

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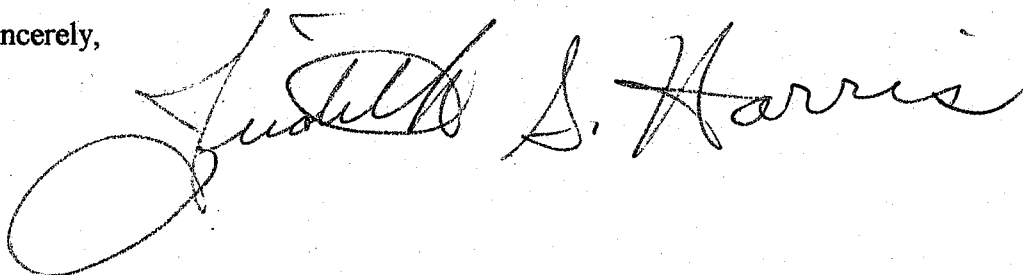
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Sincerely,



Handwritten signature of Judith S. Harris in cursive script.

INDEPENDENT REGULATION
RENEW COMMISSION

2007 FEB 15 AM 11:11

RECEIVED

2559

RECEIVED
2007 FEB 15 AM 11:14
INDEPENDENT REGULATORY
REVIEW COMMISSION

January 24, 2007

Arthur Coccodrilli, Chairman
Independent Regulatory Review Commission
333 Market Street, 14th Floor
Harrisburg, PA 17101

Dear Chairman Coccodrilli,

As a Pennsylvania breeder, I am strongly opposed to the overly restrictive rules and regulations that are proposed for kennel owners. The enforcement of regulations such as these will effectively serve to shut down or severely curtail the activities of the concerned, caring and law-abiding breeders in Pennsylvania. The extensive number of regulations outlined in this proposal and the limited time allotted prevents the proper consultation and review of these regulations with our kennel veterinarian and other professionals. Therefore, in order to allow for the proper review and consultation of this extensive proposal, I request a ninety-day extension of the comment period.

As a Pennsylvania breeder, my goal and the goal of other law-abiding breeders is to raise the best quality and healthiest puppy possible. This is not the issue. Unfortunately, the issue created by this proposal is my rights as a citizen of this state to own property, and my rights to be afforded due process guaranteed by the provisions of our state's constitution. The vagueness of this proposal causes great concern that my rights as a citizen will be omitted by the bias opinion of those who will hear my side of the story.

As a Pennsylvania breeder, I am concerned that these overly burdensome regulations will have severe unforeseen consequences. These include reduced number of breeders willing to deal with the excessive administrative burden caused by these regulations. The shortages of puppies and resulting higher prices, which will encourage the import of oversea and out of state puppies. The ensuing shortages will provide a lucrative opportunity for those who operate beneath the law to fill these shortages. Those who participate in this black market will find the rewards well worth the risk. Additionally, the economic loss to the state will be in the millions, and will go far beyond the breeder to include pet supply retailers, cities who sponsor shows, and state tax revenue.

As a Pennsylvania breeder, I believe it is unfortunate that this proposal appears to be more about animal activism than about animal welfare. You only have to consider the one section that permits shelters and other similar facilities that provide a "service" to be exempt from these regulations. I immediately question the intent behind those who are pushing the governor on this issue. What sense does it make to remove animals from a substandard facility and place them in another substandard facility? None! Furthermore, this proposal has no incentives or educational programs for the breeders. It is all threats and punishment, which is another indication, that the motives of those supporting this proposal are more interested in eliminating our industry than in improving our industry.

Sincerely,



Mountain View Kennels

January 24, 2007

Arthur Coccodrilli, Chairman
Independent Regulatory Review Commission
333 Market Street, 14th Floor
Harrisburg, PA 17101

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Sincerely,

L. A. Lapp

RECEIVED
2007 FEB 15 AM 11:22
INDEPENDENT REGULATORY
REVIEW COMMISSION

January 24, 2007

Arthur Coccodrilli, Chairman
Independent Regulatory Review Commission
333 Market Street, 14th Floor
Harrisburg, PA 17101

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Sincerely,
Leonard Newburger

RECEIVED

Arthur Coccodrilli, Chairman
Independent Regulatory Review Commission
333 Market Street, 14th Floor
Harrisburg, PA 17101

2007 FEB -9 AM 11:11

INDEPENDENT REGULATORY
REVIEW COMMISSION

February 2, 2007

RE: Comments on proposed Dog Law regulations

Dear Mr. Coccodrilli,

As a concerned citizen of the state of Pennsylvania, I respectfully submit this comment on the proposed changes to the Dog Law regulations.

First, I would like to commend the Department of Agriculture and the Bureau of Dog Law Enforcement for proposing amendments to the Dog Law Regulations to improve conditions for dogs housed and bred in commercial breeding operations in Pennsylvania. **It should also be noted that the proposed changes to the regulations do not bring hobby breeders under the Act. The same people who were exempt from the former regulations (i.e. hobby breeders who raise, breed, move, sell, etc. fewer than 26 dogs per year), will continue to be exempt under the revised regulations.**

Furthermore, I fully support the comments submitted by the American Society for the Prevention of Cruelty to Animals (ASPCA) on behalf of its members, and incorporate them herein by reference. Specifically, I strongly support the following:

1. The penalties in § 21.4(1)(iii) for "failure of an individual to comply with licensure provisions" should be increased from \$25 to \$300 per violation to \$25 to \$300 *per day of violation*.
2. The Secretary should be mandating to file suit to enjoin operation of unlicensed kennels where the kennel is not in compliance with the standards in the regulations and is unable to qualify for a license.
3. I commend the Department of Agriculture and the Bureau of Dog Law Enforcement for doubling the required cage size. This is perhaps the most important change that can be made to improve the quality of life for dogs in commercial breeding facilities in Pennsylvania. This provision should remain in the regulations regardless of opposition from breeders. This section should be further strengthened by adding a provision stating that where more than one dog is housed in a primary enclosure, the primary enclosure must provide adequate space for all dogs. For instance, if the enclosure houses two dogs, it must provide double the cage space that would be required for a single dog. If it houses three dogs, it must provide three times the cage space, etc.
4. I also commend the Department of Agriculture and Bureau of Dog Law Enforcement for including a provision that requires the dog wardens to visually observe the physical condition

2/3/07

Pennsylvania Department of Agriculture
Bureau of Dog Law Enforcement

Attn: Ms. Mary Bender

2301 North Cameron Street

Harrisburg, PA 17110-9408

Cc: Arthur Coccodrilli, Chairman of the Independent Regulatory Review Commission

INDEPENDENT REGULATORY
REVIEW COMMISSION

2007 FEB 15 AM 11:00

RECEIVED

Dear Ms. Bender:

I have always owned dogs and I consider them to be an important part of my family. The fact that Pennsylvania's reputation is that of "Puppy Mill Capital of the East Coast" saddens me greatly. Let's please work together to turn that horrible reputation around for the citizens of Pennsylvania, but also for those suffering who have no voice!

I am thankful to the Bureau of Dog Law for proposing new and amended kennel regulations to improve the living conditions of the dogs in commercial breeding kennels.

I fully support the proposed kennel regulations and hope for their passage.

The below listed amended regulations are of the utmost importance to me to insure ethical and humane conditions needed for "man's best friend" to have a better quality of life:

"Double the cage requirements that currently exist"

"Provide 20 min of daily exercise for each dog"

"Provide heat when temperatures drop below 50 degrees Fahrenheit, and cooling when temperatures rise above 85 degrees Fahrenheit"

"Provide better lighting and frequent air changes for ventilation"

"Remove all dogs from their cages/kennels/crates during cleaning"

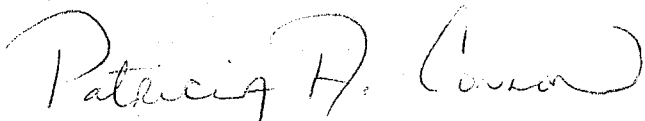
"Deny kennel licenses to those people who have been convicted of animal cruelty within the past 10 years"

Additionally, it is very important to me that you consider adding the regulation of:

"Permanent tethering cannot be used as the primary enclosure"

Thank you for your time and consideration in this matter.

Sincerely,
Patricia A. Conlon



2/3/07

Pennsylvania Department of Agriculture
Bureau of Dog Law Enforcement

Attn: Ms. Mary Bender

2301 North Cameron Street

Harrisburg, PA 17110-9408

Cc: Arthur Coccodrilli, Chairman of the Independent Regulatory Review Commission

INDEPENDENT REGULATORY
REVIEW COMMISSION

2007 FEB 15 AM 10:58

RECEIVED

Dear Ms. Bender:

I have two small dogs and we consider our dogs to be an important part of our family. I speak out whenever I feel that dogs are being treated cruelly or inhumanely. The fact that Pennsylvania's reputation is that of "Puppy Mill Capital of the East Coast" saddens me greatly. Let's please work together to turn that horrible reputation around for the citizens of Pennsylvania, but also for those suffering who have no voice!

I am thankful to the Bureau of Dog Law for proposing new and amended kennel regulations to improve the living conditions of the dogs in commercial breeding kennels.

I fully support the proposed kennel regulations and hope for their passage.

The below listed amended regulations are of the utmost importance to me to insure ethical and humane conditions needed for "man's best friend" to have a better quality of life:

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"Provide better lighting and frequent air changes for ventilation"

"Remove all dogs from their cages/kennels/crates during cleaning"

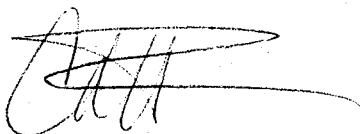
"Deny kennel licenses to those people who have been convicted of animal cruelty within the past 10 years"

Additionally, it is very important to me that you consider adding the regulation of:

"Permanent tethering cannot be used as the primary enclosure"

Thank you for your time and consideration in this matter.

Sincerely,
Cherisse Feddock



February 5, 2007

Department of Agriculture
Bureau of Dog Law Enforcement
Attn: Mary Bender
2301 North Cameron St.
Harrisburg, PA 17110-9408
Fax# 717-772-4352

INDEPENDENT REGULATORY
REVIEW COMMISSION

2007 FEB 15 AM 11:00

RECEIVED

RE: Pennsylvania Puppy Mills

Dear Ms. Bender,

I am writing you as an animal lover of Pennsylvania. For years I have not purchased any dog or cat from any pet store due to the terrible conditions associated with "puppy mills" especially in Pennsylvania, the "puppy mill capital of the East".

Last December, changes were suggested to improve kennel regulations used to inspect commercial breeding operations here in Pennsylvania. Don't you think dogs deserve more space to move around, to be protected from rain, snow, wind, and bitter cold or excess heat, and time to socialize and exercise? I definitely do. A dog, when welcomed into a family, becomes part of that family. I think most people would be horrified if they knew some of the treatment their four legged family members received prior to being bought into their homes, especially since a lot of this treatment affects their health and behavioral attitudes later in the dog's life.

Please let us all help these animals that have no voice for themselves. Let us give them the humane treatment they deserve and start their lives off knowing that humans are caring givers and not something to be feared.

Thank you for taking the time to listen.

Sincerely,


Renee Reynolds

cc Independent Regulatory Review Commission- Arthur Coccodrill
Senator Arlen Spector
Representative Jim Gerlach

To those concerned,

2/3/07

Please support the efforts to strengthen the protection of the animals in the regulations, & laws, concerning the out-dated puppy mills in our state. The Humane Society of the United States has submitted comments which we support. It's time to bring Pennsylvania into fold of caring communities, & remove a stain to our reputation.

Thank you,

Mr. + Mrs. J. Less

RECEIVED

2007 FEB 15 AM 11:01

INDEPENDENT REGULATORY
REVIEW COMMISSION

no address

RECEIVED

2007 FEB 15 AM 11:00

INDEPENDENT REGULATORY
REVIEW COMMISSION

February 7, 2007

Department of Agriculture
Bureau of Dog Law Enforcement
Attn: Mary Bender
2301 North Cameron Street
Harrisburg, PA 17110-9408
Fax: 717-772-4352

Attn: Ms. Bender


RE: PA PUPPY MILLS

I strongly support the regulations regarding the puppy mills in Pennsylvania. These dogs should be provided with more space, better protection from the elements and more time outside of their cages for exercise.

Also, I am in agreement with the Humane Society of the U.S. that shelters/rescues be exempt from the kennel expansion and exercise requirements. Foster homes should be part of this exemption and should have separate performance standards appropriate for home care settings

I am speaking for those who have not voice.
I urge you to support these regulations.

Thank you,



Juliana Van Osten
27 Hearth Rd.
Levittown, PA 19056

cc: Arthur Coccodrilli, Chairman
Independent Regulatory Review Commission
333 Market Street, 14th Floor
Harrisburg, PA 17101
Fax: 717-783-2664

211 Harvey Road
Chadds Ford, PA 19317
February 2, 2007

Department of Agriculture
Bureau of Dog Law Enforcement
Attn: Mary Bender
2301 North Cameron Street
Harrisburg, PA 17110-9408
Fax: 717-772-4352

INDEPENDENT REGULATORY
REVIEW COMMISSION

2007 FEB 15 AM 11:00

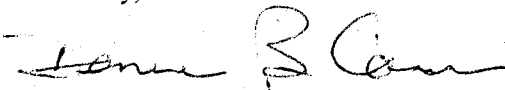
RECEIVED

Dear Ms. Bender:

I am writing in support of better treatment of dogs in puppy mills. I support the new, more humane regulations as submitted by The Humane Society of the United States. I would like the dogs in Pennsylvania puppy mills to be provided with more space, more protection from the elements, and more time outside of their cages for exercise. These reforms are long overdue.

Thank you for your consideration.

Sincerely,



Denise B. Carr

Cc Arthur Coccodrilli, Chairman
Independent Regulatory Review Commission
333 Market Street, 14th Floor
Harrisburg, PA 17101
Fax: 717-783-2664

2559

Vanessa Maga
120 Klitch st
Beaver falls, PA 15010

RECEIVED

2007 FEB 16 AM 9:48

Independent Regulatory Review Commission
Attn: Arthur Coccodrilli, Chairman
333 Market Street, 14th Floor
Harrisburg, PA 17101

INDEPENDENT REGULATORY
REVIEW COMMISSION

January 31, 2007

Dear Chairman Coccodrilli,

I am writing in response to oppose the Dog Law Regulations Act 225 recently issued on December 16, 2006. The current regulatory proposals in general are unenforceable and extremely onerous when put into practice.

The proposed regulations call for kennels to be specific in regard to exercise and cleaning records. These would require a substantial increase in manpower and time dedicated to filling out written bureaucratic reports, it would be impossible to verify their accuracy. This change would also divert the small business owner's time away from caring for their animals.

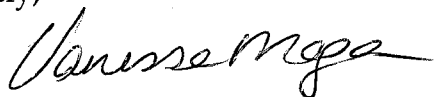
The bureau already requires the name, address, acquisition date, disposition date, type of sale, breed, sex, color, whelping date, and identification number be recorded for each and every dog sold, transferred, adopted, or given away. If the department wishes to enforce the law, they already have all information needed.

Unless the kennel has purchased, sold, or transferred more than 26 dogs in a calendar year to the individual, it is impossible for the kennel to know if the individual is required to have a Pennsylvania kennel license.

Additionally, kennels have been custom built to comply with the Department of Agriculture's Dog Law Enforcement standards that were based on USDA standards. The proposed changes of this section will require the demolition of licensed and inspected kennels and the rebuilding of entirely new dimensioned kennels. The average cost per kennel will be between \$30,000.00 and \$500,000.00 each.

I sincerely urge that this proposal be rescinded and the USDA standard be adopted in Pennsylvania.

Yours Sincerely,



2559

Independent Regulatory Review Commission
Attn: Arthur Coccodrilli, Chairman
333 Market Street, 14th Floor
Harrisburg, PA 17101

RECEIVED

2007 FEB 16 AM 9:48

INDEPENDENT REGULATORY
REVIEW COMMISSION

January 20, 2007

Dear Chairman Coccodrilli,

As a kennel owner for a good number of years, I appreciate the fact that the bureau has helped to improve the dog laws. With regard to the proposed dog law changes Act 225 issued on December 16, 2006, I have a few serious concerns.

The proposed changes would require the kennel owner to record every time a water bowl or food pan is washed, every time the primary and secondary pen enclosures are cleaned, the feeding and watering dates and times, etc. These excessive and burdensome requirements will require a substantial increase in manpower with many hours dedicated to filling out written bureaucratic reports and divert the small business owner's time away from caring for their animals.

Kennels have been custom built to comply with the Department of Agriculture's Dog Law Enforcement standards that were based on USDA standards. The proposed changes of this section will require the demolition of licensed and inspected kennels and the rebuilding of entirely new dimensioned kennels. The average cost per kennel will be between \$30,000.00 and \$500,000.00 each.

The proposed changes make no sense for all kennel owners' dogs to be seized by the Dog Law Bureau based on the Governor's proposed new requirements for pen sized or quarantine regulations. Dog Law places the same dog into a humane society not required to have the proposed new standards. It is vital to have fair and uniform kennel requirements. In addition, small business owners are affected greatly and their due process rights in court are limited if the proposed changes adopted.

I sincerely urge that this proposal be rescinded.

Yours Sincerely,



For Pet Lover's Only Pet Shop
730 Milford Road
East Stroudsburg, PA 18301

2559

Independent Regulatory Review Commission
Attn: Arthur Coccodrilli, Chairman
333 Market Street, 14th Floor
Harrisburg, PA 17101

RECEIVED

2007 FEB 16 AM 9:48

January 31, 2007

INDEPENDENT REGULATORY
REVIEW COMMISSION

Dear Chairman Coccodrilli,

I am writing in response to the proposed amendments to the Dog Law Act 225 which was issued on December 16, 2006.


The current proposed regulation changes have appeared to be burdensome and beyond rulemaking. The proposals add completely new categories and definition to the existing laws. These changes must be addressed through the legislative process.

The proposals referencing housing and social interaction of dogs of different sizes are contrary to good husbandry, socializing and training practices. Furthermore, there is no scientific or accepted husbandry basis for the amended space and exercise requirements.

In addition, the proposed regulations call for the temperature of the kennel floor to be 50F° in the warm weather. Many kennels are air conditioned to a comfortable 70F°. A dog sleeping on a 50F° floor can develop hypothermia and become ill or die. For temperature, lighting, cleaning, exercise, housing, and veterinary care, the attending veterinarian should set forth and approve procedures specific for the kennel buildings and breeds of dogs.

The proposed changes above will require Pennsylvania's licensed and inspected kennels to be demolished and rebuilt. The average cost will be between \$30,000.00 and \$500,000.00 per kennel, if the proposed laws are adopted.

The current proposed appears to be over idealistic in term of improving the welfare of dogs. I urge that this proposal be rescinded and an approach similar to the USDA standards be developed.

Yours sincerely, 

Marun Zimmerman
300 E. Black Creek Rd.
East Earl, PA 17519

FEB - 5 2007

**Ms. Mary Bender
PA Department of Agriculture
2301 North Cameron St
Harrisburg, PA 17110-9408**

Dear Ms. Bender,

I am writing to you in response to the Harrisburg Kennel Club information published in the Patriot News.

We have laws in place to deal with illegal puppy breeders. Enforce them. Also, enforce the spay-neuter program. It is not the conscientious home breeder you should be going after, it is the puppy mills. We do not need laws on the books to hamper legitimate breeders.

I have a friend who purchased purebred dogs from a private breeder. Her dogs are wonderful dogs. I know she had to go through a screening process in order to be considered for a dog. I also know she had conversations with the breeder and a personal visit with the breeder before obtaining her dog. She obtained her dogs from a licensed kennel that has followed all the rules. Her dogs are healthy, happy and a perfect specimen of the breed. They are her much beloved companions. This is due to the way her dogs were bred.

Enforce the laws we have in place regarding the puppy mills, but please DO NOT jeopardize the private breeder. It would seem to me that at the very least, you could "grandfather" the reputable kennels currently licensed that have passed inspection. Go after the puppy mills that have given Pennsylvania the stigma of producing puppy mills. Make new kennels adhere to your proposed new rules. But, make those rules feasible for the home breeder. Please do not put the reputable breeder out of business.

Sincerely,

Janice Glick

INDEPENDENT REGULATORY
PENNY COMMISSION

2007 FEB 15 AM 10:59

RECEIVED

February 6, 2007

Department of Agriculture
Bureau of Dog Law Enforcement
Attn: Mary Bender
2301 North Cameron Street
Harrisburg, PA 17110-9408
Fax: 717-772-4352

INDEPENDENT REGULATORY
PENNY COMMISSION

2007 FEB 15 AM 11:02

RECEIVED

Dear Madam:

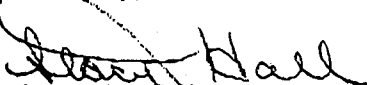
This letter is in support of changes to regulations that affect dogs in puppy mills. These animals do not have a choice in where they live or how they are treated and it is our responsibility to require that puppy mills adopt more humane regulations. People who run puppy mills are making a profit and therefore must follow these regulations.

These animals deserve a doubled cage size, daily exercise, ventilation and a central heating and cooling system to maintain a moderate and safe temperature in kennel areas. I also believe that no person convicted of animal cruelty should be able to obtain a kennel license.

I do however believe that non-profit organization such as animal shelters, rescue groups and foster homes should be exempt and have a separate set of standards. These are places where abused and neglected animals can get a second chance. I don't feel it should be any harder for these persons and organizations to continue the difficult job of saving these unfortunate animals.

Thank you for you time and consideration while reading this letter.

Sincerely,


Stacey L. Hall

no address

February 4, 2007

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

INDEPENDENT REGULATORY
REVIEW COMMISSION

2007 FEB 15 AM 10:56

RECEIVED

Dear Ms. Bender,

I am writing in support of December 16, 2006 proposal to improve the living conditions of dogs who suffer in the current Pennsylvania puppy mills. I belong to several dog organizations as well as volunteer for the Susquehanna Service Dogs. As you know, Pennsylvania is considered the "puppy mill capital of the East". I belong to one organization that wanted to have a large convention in the Lancaster area but moved the venue to Maryland because of the pitiful reputation of the Lancaster area puppy mills. This was indeed a great loss of revenue and I am sure this situation goes on much more than you realize.

The proposed legislation covers the filthy conditions that the dogs are required to live in, but does not cover the fact that females are bred over and over in the same year, producing unhealthy pups. Perhaps legislation could be added to restrict the breeding practices based on a more humane and healthful basis.

I do ask for an exception for shelters for the kennel expansion and exercise requirements. Foster homes should be exempt from kennel housing requirements and instead have separate performance standards appropriate for home care settings. Shelters and foster care home as a temporary situation and put the health and well-being of the animals first in all situations and should not be held to unrealistic requirements for the temporary situation.

Thank you for your action to help those animals who can not speak for themselves.

Sincerely,

Lori Kuhn
York PA

cc: Arthur Coccodrilli, Chairman, IRRC

Garry S. Taroli
16 Idlewood Drive
Dallas, PA 18612

February 5, 2007

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

Re: New Puppy Mill Legislation

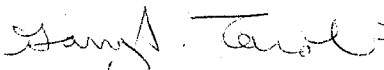
Dear Ms. Bender:

I am writing to urge Pennsylvania's adoption of new regulations which will provide for better inspection and better conditions for dogs raised in Pennsylvania puppy mills.

Certainly given our state's negative reputation with regard to puppy mills and the intolerable cruelty that is inflicted upon these poor animals, the new proposed regulations will provide better protection from the elements and provide more time for the animals to exercise outside of their cages.

I strongly urge the adoption of these additional regulations.

Sincerely,


Garry S. Taroli

cc: Arthur Coccodrilli, Chairman, Independent Regulatory Review Commission
Senator Lisa Baker
Representative Karen Boback

RECEIVED
2007 FEB 15 AM 10:54
INDEPENDENT REGULATORY
REVIEW COMMISSION

February 5, 2007

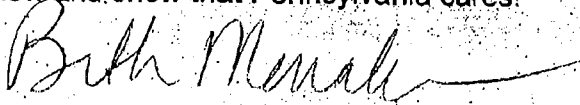
Department of Agriculture
Bureau of Dog Law Enforcement
Attn: Mary Bender
2301 North Cameron Street
Harrisburg, PA 17110-9408
Fax: 717-772-4352

Arthur Coccodrilli, Chairman
Independent Regulatory Review Commission
333 Market Street, 14th Floor
Harrisburg, PA 17101
Fax: 717-783-2664

As a long-time resident of the State of Pennsylvania, I am writing to express my support for the new kennel regulations proposed by Ed Rendell.

I would request that you add an exemption for shelters and foster homes from the kennel expansion and exercise requirements, so as not to place additional burden on the resources that are trying to help. Shelters and foster homes should have separate performance standards that appropriate for home care settings.

We've all been educated on the sick animals that come from puppy mills. Let's stop it now and show that Pennsylvania cares!



Beth Monahan
511 S. 18th Street
Philadelphia, PA 19146

INDEPENDENT REGULATORY
REVIEW COMMISSION

2007 FEB 15 AM 11:50

RECEIVED

February 4, 2007

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

INDEPENDENT REGULATORY
REVIEW COMMISSION

2007 FEB 15 AM 11:00

RECEIVED

RE: Comments on proposed Dog Law regulations

Dear Ms. Bender,

As a concerned citizen of the state of Pennsylvania, I respectfully submit this comment on the proposed changes to the Dog Law regulations.

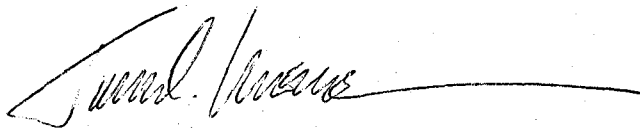
First, I would like to commend the Department of Agriculture and the Bureau of Dog Law Enforcement for proposing amendments to the Dog Law Regulations to improve conditions for dogs housed and bred in commercial breeding operations in Pennsylvania. I support all of the proposed changes.

It should also be noted that the proposed changes to the regulations do not bring hobby breeders under the Act. The same people who were exempt from the former regulations (i.e. hobby breeders who raise, breed, move, sell, etc. fewer than 26 dogs per year), will continue to be exempt under the revised regulations.

Furthermore, I fully support the comments submitted by the American Society for the Prevention of Cruelty to Animals (ASPCA) on behalf of its members.

I commend the Department of Agriculture and the Bureau of Dog Law Enforcement for proposing regulations that will improve the conditions for dogs housed and bred in Pennsylvania's commercial kennels. The changes will further ensure that such dogs are protected. Thank you for your time and consideration.

Sincerely,



Judith C. Mueller
1411 Clayton Rd.
Lancaster, PA 17603
(717) 481-5505

Mary Bender
Pa. Dept of Agriculture
2301 North Cameron St
Harrisburg, Pa 17110

Re: Doc # 06-2452 Proposed Changes to the Dog Law

Dear Ms. Bender,

I have recently been made aware of the newly proposed Pa Dog law regulations. Yes, inhumane and substandard care and housing should definitely not be tolerated but not at the expense of responsible breeders. As a member of the American Chesapeake Club relying on small scale breeders to provide sound and healthy animals is key to perpetuating this American breed. Responsible breeders should not be burdened as a result of inabilities to address inhumane operations under existing laws.

Under the proposed changes as I read them, small scale breeders will fall into the same set of requirements as the large commercial operations. Licensed breeders with a K1 license would no longer be able to maintain, breed, whelp and raise their dogs within their homes-but this is exactly the setting from which I want to be able to buy a puppy or dog! I want a dog that was raised in a home from breeders who are careful about the health of their dogs, their temperaments and bred dogs that look like the breed they are supposed to be! These breeders would have to either stop raising dogs or build facilities to meet the commercial breeders' standards which are not the way I want a puppy I'd buy raised. The proposed regulations favor the large scale operations that will have the budget to build these "sterile" kennel facilities and hire staff to maintain the outlined record keeping requirements. Why we don't even require 20 minutes of daily mandated physical exercise for our children in schools but for dogs we do!

I want to be able to buy a dog directly from a reputable breeder, not a pet shop or large scale commercial kennel. I want to know that my puppy was raised in a loving home and exposed to a variety of household situations. I want to be able to buy a dog bred with thought to health, temperament, given lots of human contact and exposed to everyday sights and sounds. I want to be able to buy a dog that was allowed to romp in the grass and was played with by children and around other dogs. This proposal goes against the very pack nature of dogs and their need to socialize with other dogs and humans.

This effort to improve living conditions for dogs and puppies in large commercial operations/puppy mills is laudable. It is a great disservice though to Pa dog lovers and the buying public to place reputable small scale breeders under the same regulations as these large operations that most of us object to anyway. I oppose these amendments and urge that this proposal be withdrawn. Let's put some common sense thought into the dog law and target the real culprit-large scale multiple breed puppy farms. Why not simply try really enforcing the current dog laws before wasting taxpayer money on regulations that require unenforceable record keeping & exercise standards and will hurt the very type of breeder that should be praised for the manner in which they raise their animals.

Sincerely,

Kevin A. Draffer
Jody Sue Draffer

Brenton Draffer

and the Brown family of Chesapeake Bay
R. Draffer

INDEPENDENT REGULATION
REVIEW COMMISSION

2007 FEB 15 AM 11:00

RECEIVED

Mary Bender
Pa. Dept of Agriculture
2301 North Cameron St
Harrisburg, Pa 17110

Re: Doc # 06-2452 Proposed Changes to the Dog Law

Dear Ms. Bender,

I have recently been made aware of the newly proposed Pa Dog law regulations. Yes, inhumane and substandard care and housing should definitely not be tolerated but not at the expense of responsible breeders.

Under the proposed changes as I read them, small scale breeders will fall into the same set of requirements as the large commercial operations. Licensed breeders with a K1 license would no longer be able to maintain, breed, whelp and raise their dogs within their homes-but this is exactly the setting from which I want to be able to buy a puppy or dog! I want a dog that was raised in a home from breeders who are careful about the health of their dogs, their temperaments and bred dogs that look like the breed they are supposed to be! These breeders would have to either stop raising dogs or build facilities to meet the commercial breeders' standards which are not the way I want a puppy I'd buy raised. The proposed regulations favor the large scale operations that will have the budget to build these "sterile" kennel facilities and hire staff to maintain the outlined record keeping requirements. Why we don't even require 20 minutes of daily mandated physical exercise for our children in schools but for dogs we do!

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This effort to improve living conditions for dogs and puppies in large commercial operations/puppy mills is laudable. It is a great disservice though to Pa dog lovers and the buying public to place reputable small scale breeders under the same regulations as these large operations that most of us object to anyway. I oppose these amendments and urge that this proposal be withdrawn. Let's put some common sense thought into the dog law and target the real culprit-large scale multiple breed puppy farms. Why not simply try really enforcing the current dog laws before wasting taxpayer money on regulations that require unenforceable record keeping & exercise standards and will hurt the very type of breeder that should be praised for the manner in which they raise their animals.

Sincerely,

John R. Schae

INDEPENDENT REGULATORY
REVIEW COMMISSION

2007 FEB 15 AM 11:00

RECEIVED

Mary Bender
Pa. Dept of Agriculture
2301 North Cameron St
Harrisburg, Pa 17110

Re: Doc # 06-2452 Proposed Changes to the Dog Law

Dear Ms. Bender,

I have recently been made aware of the newly proposed Pa Dog law regulations. Yes, inhumane and substandard care and housing should definitely not be tolerated but not at the expense of responsible breeders.

*please take a moment
to read my comments on the reverse side.*

Under the proposed changes as I read them, small scale breeders will fall into the same set of requirements as the large commercial operations. Licensed breeders with a K1 license would no longer to be able to maintain, breed, whelp and raise their dogs within their homes-but this is exactly the setting from which I want to be able to buy a puppy or dog! I want a dog that was raised in a home from breeders who are careful about the health of their dogs, their temperaments and bred dogs that look like the breed they are supposed to be! These breeders would have to either stop raising dogs or build facilities to meet the commercial breeders' standards which are not the way I want a puppy I'd buy raised. The proposed regulations favor the large scale operations that will have the budget to build these "sterile" kennel facilities and hire staff to maintain the outlined record keeping requirements. Why we don't even require 20 minutes of daily mandated physical exercise for our children in schools but for dogs we do!

I want to be able to buy a dog directly from a reputable breeder, not a pet shop or large scale commercial kennel. I want to know that my puppy was raised in a loving home and exposed to a variety of household situations. I want be able to buy a dog bred with thought to health, temperament, given lots of human contact and exposed to everyday sights and sounds. I want to be able to buy a dog that was allowed to romp in the grass and was played with by children and around other dogs. This proposal goes against the very pack nature of dogs and their need to socialize with other dogs and humans.

This effort to improve living conditions for dogs and puppies in large commercial operations/puppy mills is laudable. It is a great disservice though to Pa dog lovers and the buying public to place reputable small scale breeders under the same regulations as these large operations that most of us object to anyway. I oppose these amendments and urge that this proposal be withdrawn. Let's put some common sense thought into the dog law and target the real culprit-large scale multiple breed puppy farms. Why not simply try really enforcing the current dog laws before wasting taxpayer money on regulations that require unenforceable record keeping & exercise standards and will hurt the very type of breeder that should be praised for the manner in which they raise their animals.

Sincerely,

Bethley H. Nauman

*member, York Kennel Club and past officer and
Board of Director.*

INDEPENDENT REGULATORY
REVIEW COMMISSION
2007 FEB 15 AM 11:00

RECEIVED

Mary Bender
Pa. Dept of Agriculture
2301 North Cameron St
Harrisburg, Pa 17110

Re: Doc # 06-2452 Proposed Changes to the Dog Law

Dear Ms. Bender,

I have recently been made aware of the newly proposed Pa Dog law regulations. Yes, inhumane and substandard care and housing should definitely not be tolerated but not at the expense of responsible breeders. _____

Under the proposed changes as I read them, small scale breeders will fall into the same set of requirements as the large commercial operations. Licensed breeders with a K1 license would no longer be able to maintain, breed, whelp and raise their dogs within their homes-but this is exactly the setting from which I want to be able to buy a puppy or dog! I want a dog that was raised in a home from breeders who are careful about the health of their dogs, their temperaments and bred dogs that look like the breed they are supposed to be! These breeders would have to either stop raising dogs or build facilities to meet the commercial breeders' standards which are not the way I want a puppy I'd buy raised. The proposed regulations favor the large scale operations that will have the budget to build these "sterile" kennel facilities and hire staff to maintain the outlined record keeping requirements. Why we don't even require 20 minutes of daily mandated physical exercise for our children in schools but for dogs we do!

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Sincerely,

Lesti Ann Keller

INDEPENDENT REGULATORY
REVIEW COMMISSION

2007 FEB 15 AM 11:00

RECEIVED

Mary Bender
Pa. Dept of Agriculture
2301 North Cameron St
Harrisburg, Pa 17110

Re: Doc # 06-2452 Proposed Changes to the Dog Law

Dear Ms. Bender,

I have recently been made aware of the newly proposed Pa Dog law regulations. Yes, inhumane and substandard care and housing should definitely not be tolerated but not at the expense of responsible breeders. I have personal interest in your new legislation as I have purchased a Chesapeake Bay Retriever from Penn. I drive over 500 miles to get him. I drive over 500 miles to have a breeder show him. I could have got one here in Ind. for about half the price at a puppy factory, but did not. Your rules should apply to people raising mutts like Cocker Spaniel or Labradors and selling them for enormous prices not people trying to raise legitimate

Under the proposed changes as I read them, small scale breeders will fall into the same set of requirements as the large commercial operations. Licensed breeders with a K1 license would no longer be able to maintain, breed, whelp and raise their dogs within their homes-but this is exactly the setting from which I want to be able to buy a puppy or dog! I want a dog that was raised in a home from breeders who are careful about the health of their dogs, their temperaments and bred dogs that look like the breed they are supposed to be! These breeders would have to either stop raising dogs or build facilities to meet the commercial breeders' standards which are not the way I want a puppy I'd buy raised. The proposed regulations favor the large scale operations that will have the budget to build these "sterile" kennel facilities and hire staff to maintain the outlined record keeping requirements. Why we don't even require 20 minutes of daily mandated physical exercise for our children in schools but for dogs we do!

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Sincerely,

Perry W. Carpenter
Debra J. Carpenter

INDEPENDENT REGULATORY
REVIEW COMMISSION

2007 FEB 15 AM 11:00

RECEIVED

AKC Dogs.
I could not
be happier
with my
dog from
Penn. I will
probably
get another
where I go
Sand Hollow:
Big Water
Bear. IF
They are
still open
which is
doubtful
under your
proposal

Morans Midnight Kennel Inc.
1510 Mars Hill Rd
Sutersville, PA 15083

2559

RECEIVED

2007 FEB 16 AM 9:48

January 26, 2007

Independent Regulatory Review Commission
Attn: Arthur Coccodrilli, Chairman
333 Market Street, 14th Floor
Harrisburg, PA 17101

INDEPENDENT REGULATORY
REVIEW COMMISSION

Dear Chairman Coccodrilli,

I am writing in response to the proposed amendments to the Dog Law Act 225 which was issued on December 16, 2006.

With a full understanding that the bureau is trying to improve substandard kennel conditions, I am not in agreement that most of the changes are necessary.

The proposed record keeping would require me to write down the date and time I washed each food and water bowl, every time a pen is cleaned; each individual outside run is cleaned, etc. It would be better for me to have my general daily procedures that I routinely follow, in writing. This is similar to how the USDA regulations are worded.

The proposed changes would also require the demolition of Pennsylvania's licensed and inspected kennels. Yet, there is no scientific basis for the change. In addition, the average cost to rebuild kennel will be between \$30,000.00 and \$500,000.00 each.

I sincerely urge that this proposal be withdrawn, as the beneficial outcome will be in question if the proposal is adopted.

Yours truly,



2559

RECEIVED

Independent Regulatory Review Commission
Attn: Arthur Coccodrilli, Chairman
333 Market Street, 14th Floor
Harrisburg, PA 17101

2007 FEB 16 AM 9:48

INDEPENDENT REGULATORY
REVIEW COMMISSION

January 30, 2007

Dear Chairman Coccodrilli,

I am writing in response to the Dog Law Act 225 that was issued on December 16, 2006, of which I have several disagreements. The regulatory proposals in general are very difficult and costly to enforce, extremely onerous, and not feasible when put in to practice.

The new proposal only permits a licensed kennel to buy from another licensed kennel. This is fraud for the following reasons:

1. Unless the kennel has purchased, sold, or transferred more than 26 dogs in a calendar year to the individual, it is impossible for the kennel to know if the individual is required to have a Pennsylvania kennel license.
2. It is unlawful for the department to regulate and inspect kennels outside of Pennsylvania.
3. The Pennsylvania Department of Agriculture Dog Law Enforcement Bureau already requires the name, address, acquisition date, disposition date, type of sale, breed, sex, color, whelping date, and identification number be recorded for each and every dog sold, transferred, adopted, or given away. If the Department wishes to enforce the law, they already have all information needed.

The proposals referencing to housing and social interaction of dogs of different sizes are contrary to good husbandry, socializing and training practices. Moreover, there is no scientific or accepted husbandry basis for the amended space and exercise requirements.

The current proposal claims to be a general list of ideas to improve the breeding environment for dogs, which are neither substantiated by science nor attributed as accepted canine husbandry practices. A better idea would be for Pennsylvania to adopt USDA type standards.

I sincerely request that this proposal be withdrawn.

Yours Sincerely,

Helen Wesner



*Helen & Don Wesner
1845 Plum Creek Road
Roaring Spring PA 16673*

2559

RECEIVED

Independent Regulatory Review Commission
Attn: Arthur Coccodrilli, Chairman
333 Market Street, 14th Floor
Harrisburg, PA 17101

2007 FEB 16 AM 9:48

January 27, 2007

INDEPENDENT REGULATORY
REVIEW COMMISSION

Dear Chairman Coccodrilli,

I am writing in response to the proposed amendments to the Dog Law Act 225 which was issued on December 16, 2006.

The current proposed regulation changes have appeared to be burdensome and beyond rulemaking. The proposals add completely new categories and definition to the existing laws. These changes must be addressed through the legislative process.

The proposals referencing housing and social interaction of dogs of different sizes are contrary to good husbandry, socializing and training practices. Furthermore, there is no scientific or accepted husbandry basis for the amended space and exercise requirements.

In addition, the proposed regulations call for the temperature of the kennel floor to be 50F° in the warm weather. Many kennels are air conditioned to a comfortable 70F°. A dog sleeping on a 50F° floor can develop hypothermia and become ill or die. ~~For temperature, lighting, cleaning, exercise, housing, and veterinary care, the attending veterinarian should see forth and approve procedures specific for the kennel buildings and breeds of dogs.~~

The proposed changes above will require Pennsylvania's licensed and inspected kennels to be demolished and rebuilt. The average cost will be between \$30,000.00 and \$500,000.00 per kennel, if the proposed laws are adopted.

The current proposed appears to be over idealistic in term of improving the welfare of dogs. I urge that this proposal be rescinded and an approach similar to the USDA standards be developed.

Yours sincerely,

Jack Eddy
Windy Knob Kennel
Bridge Street Hill Rd.
Towanda, PA 18848

DEAR SIR,

I AM A SMALL BREEDER, NOT A PUPPY MILL. THIS WILL
KILL ME. PLEASE, PLEASE STOP ACT 225

THANKS

2559

Keystone Kennel
John L. Yoder
20493 Stony Rd
Willow Hill Pa. 17271

January 24, 2007

Arthur Coccodrilli, Chairman
Independent Regulatory Review Commission
333 Market Street, 14th Floor
Harrisburg, PA 17101

RECEIVED

2007 FEB 16 AM 9:48

INDEPENDENT REGULATORY
REVIEW COMMISSION

Dear Chairman Coccodrilli,

As a Pennsylvania breeder, I am strongly opposed to the overly restrictive rules and regulations that are proposed for kennel owners. The enforcement of regulations such as these will effectively serve to shut down or severely curtail the activities of the concerned, caring and law-abiding breeders in Pennsylvania. The extensive number of regulations outlined in this proposal and the limited time allotted prevents the proper consultation and review of these regulations with our kennel veterinarian and other professionals. Therefore, in order to allow for the proper review and consultation of this extensive proposal, I request a ninety-day extension of the comment period.

As a Pennsylvania breeder, my goal and the goal of other law-abiding breeders is to raise the best quality and healthiest puppy possible. This is not the issue. Unfortunately, the issue created by this proposal is my rights as a citizen of this state to own property, and my rights to be afforded due process guaranteed by the provisions of our state's constitution. The vagueness of this proposal causes great concern that my rights as a citizen will be omitted by the bias opinion of those who will hear my side of the story.

As a Pennsylvania breeder, I am concerned that these overly burdensome regulations will have severe unforeseen consequences. These include reduced number of breeders willing to deal with the excessive administrative burden caused by these regulations. The shortages of puppies and resulting higher prices, which will encourage the import of oversea and out of state puppies. The ensuing shortages will provide a lucrative opportunity for those who operate beneath the law to fill these shortages. Those who participate in this black market will find the rewards well worth the risk. Additionally, the economic loss to the state will be in the millions, and will go far beyond the breeder to include pet supply retailers, cities who sponsor shows, and state tax revenue.

As a Pennsylvania breeder, I believe it is unfortunate that this proposal appears to be more about animal activism than about animal welfare. You only have to consider the one section that permits shelters and other similar facilities that provide a "service" to be exempt from these regulations. I immediately question the intent behind those who are pushing the governor on this issue. What sense does it make to remove animals from a substandard facility and place them in another substandard facility? None! Furthermore, this proposal has no incentives or educational programs for the breeders. It is all threats and punishment, which is another indication, that the motives of those supporting this proposal are more interested in eliminating our industry than in improving our industry.

Sincerely,

John L. Yoder

January 24, 2007

Arthur Coccodrilli, Chairman
Independent Regulatory Review Commission
333 Market Street, 14th Floor
Harrisburg, PA 17101

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Sincerely,

John Venturini
For Pet Lovers Only
730 Milford Rd.
E. Stroudsburg PA 18301
570 421 2862

2559

January 24, 2007

Arthur Coccodrilli, Chairman
Independent Regulatory Review Commission
333 Market Street, 14th Floor
Harrisburg, PA 17101

RECEIVED

2007 FEB 16 AM 9:48

INDEPENDENT REGULATORY
REVIEW COMMISSION

Dear Chairman Coccodrilli,

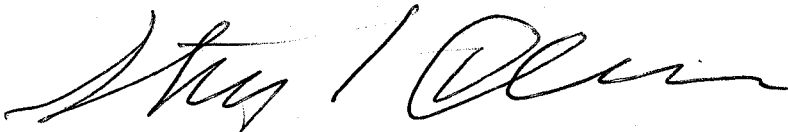
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Sincerely,



2559

Erica Mumford
34 Kulp Road East
Chalfont, PA 18914

Arthur Coccodrilli, Chairman
Independent Regulatory Review Commission
333 Market Street, 14th Floor
Harrisburg, PA 17101

Dear Mr. Coccodrilli,

I am writing to express my ardent support for the proposed changes to puppy mills and the more humane regulations being introduced. Such changes can drastically improve the living conditions and lives of dogs who are currently suffering in puppy mills. These changes to the regulations include the following:

- * doubling the minimum cage size
- * requiring daily exercise outside of the cage
- * required heat when the temperature drops below 50 degrees
- * required cooling when the temperature rises above 85 degrees
- * improving ventilation in kennel areas
- * denying kennel licenses to individuals convicted of animal cruelty

However, an exemption is appropriate for shelters and foster homes, which should have alternate performance standards.

Thank-you for your time and help in this critical matter! Hopefully, we can significantly improve the lives of these poor, innocent dogs!

Sincerely,



Erica Mumford

RECEIVED
 2007 FEB 16 AM 9:29
 INDEPENDENT REGULATORY
 REVIEW COMMISSION

2559



Fax

2007 FEB 16 AM 9:29
INDEPENDENT REGULATORY
REVIEW COMMISSION
RECEIVED

To: Dog Law Bureau Director Mary Bender
From: Carrie Corboy
Independent Regulatory Review
Commission

Fax: 717.772.4352
717.783.2664
Pages: 1

Phone: 609-397-8382
Date: 2/14/2007

Re: Dept of Agriculture, Dog Law Regs
CC:

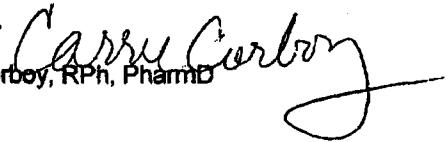
Urgent **For Review** **Please Comment** **Please Reply** **Please Recycle**

Dog Law Bureau Director, Independent Regulatory Review Commission:

I support the changes to the commercial dog regulations submitted by the Coalition Against Misery. The proposed regulations by the Pennsylvania Department of Agriculture that were recently published in the Pennsylvania Bulletin do not adequately address the issues of temperature control, cage conditions and humane breeding practices.

I am strongly opposed to commercial breeding kennels where the costs are minimized by providing substandard care and conditions for the dogs in an effort to increase the profit. I am writing to request that you immediately take steps to address the horrific conditions in commercial kennels in Pennsylvania. Every kennel must be required to have a visible, safe source of heat and air-conditioning. Additionally, the regulations should limit the number of dogs that are kept in a cage. And finally, we ask that you include breeding regulations consistent with those established by reputable breed clubs.

It is a profound embarrassment that Pennsylvania is known as the Puppy Mill Capital of the East Coast. Please take steps to ensure that the new regulations provide humane conditions for the dogs. Thank you

Sincerely,

Carrie Corboy, RPh, PharmD