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1218 Duffield Street  
Pittsburgh, PA 15206  
1/23/07

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

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Dear Ms. Bender,

My name is Pat Larkin and I live in the city of Pittsburgh. I am writing because I am concerned about the proposed amendments to the PA dog law regulations issued 12/16/06. I own golden retrievers and have done so for the past 25 + years. In my opinion there is not another breed that meets my expectations and desires for a pet better than the golden. I recently had a very bad experience with a breeder that owns a kennel and breeds litter after litter after litter, sometimes as many as three at a time. The legislation that is proposed would limit the breeders to those people who are "in it for the money" instead of a true love of the breed. I will spare you the details unless you specifically ask for them, but I lost a 10 week old puppy for no apparent reason and lost all my money to the breeder. I have since purchased another puppy from a hobby breeder who cares about the golden retriever breed and the puppies she breeds. He is healthy, happy and everything I could wish for. Your proposed amendments to the law will end hobby breeders' ability to breed quality goldens and will therefore limit my choices and force me to accept puppies bred with questionable breeding practices and to endure the health and temperment problems that result.

I believe that inhumane and substandard kennel conditions should not be tolerated, but I do not agree that most of the proposed regulatory charges are needed, nor would they 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.

Smaller breeders and dog owners who maintain their dogs in their own residential premises but are covered by the PA 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 proposals pertaining to housing and social interaction of dogs of different sizes are contrary to good husbandry, socialization and training practices.

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.

Pat Larkin

Cc: Jim Ferlo  
Lisa Bennington  
Pennsylvania Federation of Dog Clubs