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February 15, 2007

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

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INDEPENDENT REGULATORY  
REVIEW COMMISSION

Dear Ms. Bender:

Thank you for your letter of January 24, 2007 regarding the Proposed Regulation, Amendments to Dog Law Regulations, I.D. No. 2-152, Published at 36 *Pennsylvania Bulletin* 7596 (December 16, 2006).

As licensed Pennsylvania Kennel owners since 1999, we would like to elaborate further on the above proposal.

Under the current Dog Law Regulations, and attested to by Cathy McKinney, we have a "very clean facility", which includes both indoor and outdoor kennels for our 16 Labrador Retrievers (not including 3 who are "seniors" and live in our home). All have pitched concrete flooring with draining. We are very concerned about the health of our "pets/breeders/breeder hopefuls" and do everything to keep them healthy, clean and comfortable.

We have reviewed the proposed amendments and feel they are necessary to eliminate the "puppy mill" type kennels and to provide proper care of the canine population. Our concern is that there are many licensed kennels in the Commonwealth that are designed with the same concerns and are functioning to the same end, but are not specifically following the proposed amendments to the "letter". We would like to see consideration taken for function rather than form. That is, if we have proper housing, drainage, climate control, feeding, exercise, health care, waste management, documentation, etc., but are not meeting the specifics of the proposed amendments exactly, will we be compelled to rebuild, even if the end result meets the criteria? There will be quite a bit of additional expenses incurred if this is so, and from our standpoint, every dollar our kennel earns goes directly back into the care and feeding of our labs. Veterinary fees, food and supply bills, maintenance of kennel buildings, etc. are quite expensive if the kennel owners share our mission of "only the best for our gang".

I hope our comments will help.

Sincerely,

Arlene L. Renninger