

2865 Tycolia Court
Orefield, PA 18069
Feb 19, 2006

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

Dear Ms. Bender:

I've become a recent dog owner in the last year, (always have been a dog lover) and am VERY concern of the proposed changes. I've taken an active roll in selecting, and proper training for my 1 ½ year old Golden Retriever. My dog has come from what would be called the hobby breeder which these regulations would greatly impact. My dog is a stand-up citizen with his CGC AKC title (along with his RN). He has also been able to become a dog blood donor (which you need to have an even temperament in order to lie still for 10 to 15 mins while blood is being withdrawn. I do not believe I would have gotten the same quality of dog if I had to have gone through a kennel.

Being a concerned dog owner and looking for the future purchases of dogs, I am writing to comment on the proposed amendments to the Pennsylvania dog laws 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, and/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.

Here are just a few examples of problems with the proposal:

- The definition of "temporary housing" would require thousands of small residential hobby and show breeding households to become licensed which could not possibly comply with the regulations, and which there is no reason to regulate.
- There is no scientific or accepted husbandry basis for the amended space and exercise requirements.
- 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 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.

Sincerely,

A handwritten signature in cursive script that reads "Bernetta M. Dougert". The signature is written in dark ink and includes a long horizontal flourish extending to the right.

Bernetta M Dougert