

2559

RECEIVED

2007 FEB 20 AM 11:18

INDEPENDENT REGULATORY
REVIEW COMMISSION

February 10, 2007

Dear Sir or Madam,

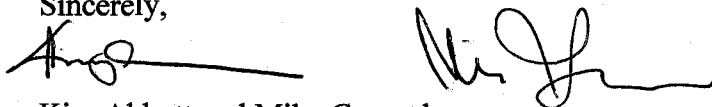
We are writing to express our support for the newly proposed 'puppy mill' regulations, which would significantly improve the lives of puppy mill dogs.

As Pennsylvania residents and owners of two rescue dogs, we are deeply outraged and saddened by our state's reputation as the 'puppy mill capital of the East.' We fervently believe that no one should be profiting from another creature's suffering. Although the best-case scenario would be to end puppy mills, period, these new regulations are a great step towards mitigating the suffering of what we consider family members.

Please support these new regulations!

Thank you for your attention.

Sincerely,

Handwritten signatures of Kim Abbott and Mike Generalao. The signature on the left is a cursive signature that appears to be 'Kim Abbott'. The signature on the right is a cursive signature that appears to be 'Mike Generalao'.

Kim Abbott and Mike Generalao

2559

February 14, 2007

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

RECEIVED

2007 FEB 20 AM 11:17

INDEPENDENT REGULATORY
REVIEW COMMISSION

Dear Mr. Coccodrilli,

I am writing to ask that you support the proposed changes to the outdated Pennsylvania kennel regulations—currently used to inspect commercial breeding operations.

I believe the proposed changes could improve the living conditions of dogs who currently suffer in puppy mills.

Please support this legislation by voting in favor of the following requirements:

- » doubling the minimum cage size
- » requiring daily exercise outside of the cage
- » required heat when the temperature drops below 50 degrees
- » required cooling (by fan or air conditioning) when the temperature rises above 85 degrees
- » improving ventilation in kennel areas
- » denying kennel licenses to individuals convicted of animal cruelty within the past 10 years

I ask that shelters be exempt from the kennel expansion and exercise requirements and foster homes be exempt from kennel housing requirements. Foster homes should have separate performance standards appropriate for home care settings.

Thank you.

Sincerely,



Karen E. Winkler
11-18 Aspen Way
Doylestown, PA 18901

2559

RECEIVED

February 7, ~~2006~~ 2007

2007 FEB 20 AM 11:17

INDEPENDENT REGULATORY
REVIEW COMMISSION
Arthur Coccodrilli Chairman
Independent Regulatory Review Commission
333 Market St. 14th Floor
Harrisburg, Pa. 17101

Attn. Mary Bender

I urge you to support the new more humane regulations changes to the out dated kennel regulations.

I believe the following regulations to effect dogs in puppy mills should include the following:

- 1 Doubling the minimum cage size
- 2 Requiring daily exercise outside of the cage
- 3 Require heat when temperature drops below 50 degrees
- 4 Required cooling (by fan or air conditioning) when temperature rises above 85 degrees
- 5 Improve ventilation
- 6 Denying kennel licenses to individuals convicted of animal cruelty.

Also, I ask for an exemption for shelters from the kennel expansion and exercise requirements, note that foster homes should be exempt from kennel housing requirements and instead have separate performances standard appropriate for home care settings.

Thank you,

Sincerely,

Ms. Betty Ciccimaro
Ms. Betty Ciccimaro
Philadelphia, Pa.

2559

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2007 FEB 20 AM 11:17

INDEPENDENT REGULATORY
REVIEW COMMISSION

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

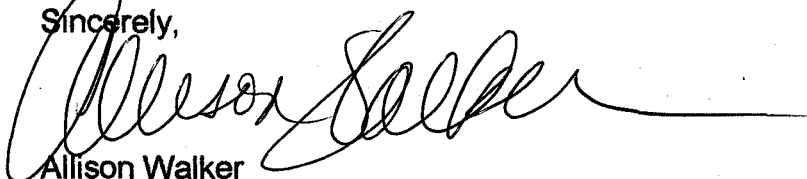
February 11, 2007

Dear Mr. Coccodrilli,

I am writing to you to request that you support the changes to the kennel regulations currently used to inspect commercial breeding operations in Pennsylvania that were proposed on December 16th. The proposed changes could improve the living conditions of dogs who currently suffer in puppy mills.

Please support these more humane regulations which include doubling the minimum cage size, requiring daily exercise, required heat when temperature drops below 50 degrees, required cooling when temperatures rise above 85 degrees, improved ventilation in kennel areas and denying kennel licenses to individuals convicted of animal cruelty within the past ten years. As I am sure you can see these changes can help make a huge difference in the lives of dogs born to breeders and will go a long way to help change Pennsylvania's image as the Puppy Mill Capital of the East.

Sincerely,



Allison Walker
3 Apple Tree Lane
Newtown Square, PA 19073

2559 Rec'd 2/16/07

Renee Snyder, Ph.D.

155 MONTE CRESTA AVE #106, OAKLAND, CALIFORNIA 94611

February 16, 2007

Independent Regulatory Review Commission
(717) 783-2664

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.

You should be embarrassed 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.

Sincerely,



Renee Snyder, Ph.D.

2559

February 13, 2007

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

RECEIVED

2007 FEB 20 AM 11: 17

INDEPENDENT REGULATORY
REVIEW COMMISSION

Dear Mr. Coccodrilli:

I am writing to voice my support for the proposed changes in Pennsylvania's outdated kennel regulations currently used to inspect commercial breeding operations in the State. These changes include:

- Doubling the minimum cage size
- Requiring daily exercise outside of the cage
- Requiring heat when the temperature drops below 50 degrees
- Requiring cooling (by fan or air conditioning) when the temperature rises above 85 degrees
- Improving ventilation in kennel areas
- Denying kennel licenses to individuals convicted of animal cruelty within the past 10 years.

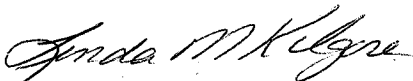
I also support the following exemptions from the proposed changes in the regulations:

- Exemption for animal shelters from the kennel expansion and exercise requirements.
- Exemption for foster homes from the kennel housing requirements and instead have separate performance standards appropriate for home care settings.

These proposed changes would improve the living conditions of dogs who currently suffer in puppy mills across the State, as well as help Pennsylvania shed the negative reputation of 'the puppy mill capital of the East.' Please do what you can to ensure that these changes are approved and put into effect as soon as possible.

Thank you for your consideration in this matter.

Sincerely,



Linda M. Kilgore
725 Kilbuck Drive
Cranberry Twp., PA 16066

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

RECEIVED

2007 FEB 20 AM 11:15

INDEPENDENT REGULATORY
REVIEW COMMISSION

2559

January 30, 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.

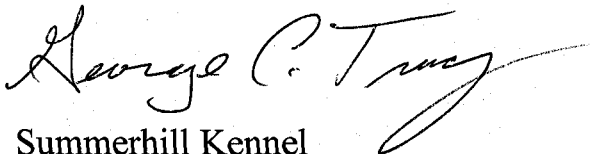
I appreciate that fact that the bureau has helped to improve the dog laws in the past several years. However, the current proposed regulation changes have appeared to be intentionally burdensome and go far beyond mere rulemaking.

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,



Summerhill Kennel
4532 Dogwood Lane
Glenville, PA 17329

2559

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

RECEIVED

2007 FEB 20 AM 11: 10

INDEPENDENT REGULATORY
REVIEW COMMISSION

January 30, 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.

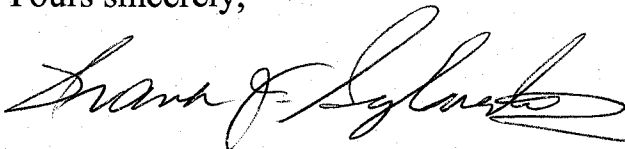
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The proposed changes require the kennel owner to record every time a water bowl or food pan is washed, every time the primary and secondary pen enclosures are cleaned, and the feeding and watering dates and times, etc. All these burdensome and excessive 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,



Stonewall Farm Kennel
166 Sickler Pond Rd
Jermyn, PA 18433

2559

IRRC

Attn: Mr. John H. Jewett
14th Floor HARRISTOWN 2
333 Market St.
Harrisburg, PA 17101

RECEIVED

2007 FEB 20 AM 11:16

INDEPENDENT REGULATORY
REVIEW COMMISSION

January 31, 2007

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

Dear Mr. Jewett,

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,

Annie Stoltzfus
650 Sawmill Rd
Cochranville, PA 19330

Annie Stoltzfus

2559

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

RECEIVED

2007 FEB 20 AM 11:19

INDEPENDENT REGULATORY
REVIEW COMMISSION

January 30, 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.

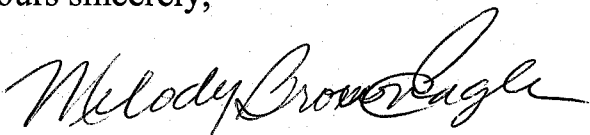
I appreciate that fact that the bureau has helped to improve the dog laws in the past several years. However, the current proposed regulation changes have appeared to be intentionally burdensome and go far beyond mere rulemaking.

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,



Summit Knoll
369 N. Summit Rd
Jamestown, PA 16134

2559

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

RECEIVED

2007 FEB 20 AM 11:10

January 26, 2007

INDEPENDENT REGULATORY
REVIEW COMMISSION

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:

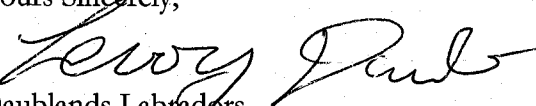
1. Unless the kennel has purchased, sold, or transferred more than 26 dogs in a calendar year to the individual, it is impossible for the kennel to know if the individual is required to have a Pennsylvania kennel license.
2. It is unlawful for the department to regulate and inspect kennels outside of 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,


Daublands Labradors
1380 Pine Grove Rd.
Fredericksburg, PA 17026

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

RECEIVED

2007 FEB 20 AM 11:17

INDEPENDENT REGULATORY
REVIEW COMMISSION

January 19, 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,



Diane Hermort
50 Hill Lane
Mohnton, PA 19540

2559

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

RECEIVED

2007 FEB 20 AM 11:18

January 27, 2007

INDEPENDENT REGULATORY
REVIEW COMMISSION

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:

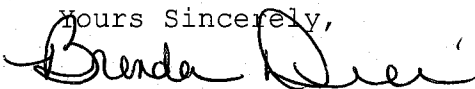
1. Unless the kennel has purchased, sold, or transferred more than 26 dogs in a calendar year to the individual, it is impossible for the kennel to know if the individual is required to have a Pennsylvania kennel license.
2. It is unlawful for the department to regulate and inspect kennels outside of Pennsylvania.
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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,



Brenda Dice
104 Maple Drive
Fredericksburg, PA 17026

2559

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

RECEIVED

2007 FEB 20 AM 11:18

January 31, 2007

INDEPENDENT REGULATORY
REVIEW COMMISSION

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,

Ealy's Coonhollow Kennel
108 Hilliards Rd
Petroliia, PA 16050

2559

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

RECEIVED

2007 FEB 20 AM 11:19

INDEPENDENT REGULATORY
REVIEW COMMISSION

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,



DonnaDice
104 Maple Drive
Fredericksburg, PA 17026

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 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,

Audia Mae Stoltz
Williams Run Kennel
22 William Run Rd
Christiana, PA 17509

INDEPENDENT REGULATORY
REVIEW COMMISSION

2007 FEB 20 AM 11:18

RECEIVED

REVEREND BARBARA GUNSEL-MEARNS
43 PREAKNESS ST.
HANOVER, PA 17331

Arthur Coccodrilli, Chairman
Independent Regulatory Review Commission
333 Market Street, 14th Floor
Harrisburg, PA 17101
February 8, 2007

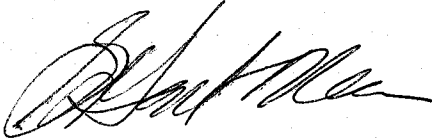
Dear Chairman Coccodrilli:

As a minister and person of faith, I am writing to request that you support the proposed Dog Law Enforcement bill to improve the conditions of animals in the "puppy mills" of Pennsylvania. Please include the following provisions:

- » doubling the minimum cage size
- » requiring daily exercise outside of the cage
- » required heat when the temperature drops below 50 degrees
- » required cooling (by fan or air conditioning) when the temperature rises above 85 degrees
- » improving ventilation in kennel areas
- » denying kennel licenses to individuals convicted of animal cruelty within the past 10 years

There is no excuse to disregard the suffering of another of God's creatures when we have the ability to change that situation. It is important that we alleviate the suffering of all species, both human and non-human whenever we have the capacity to do so. We have the ability to leave the world better than we found it, so let's work together to do it. Thank you for your attention to this matter.

Peace and blessings,



Reverend Barbara Gunsel-Mearns

INDEPENDENT REGULATORY
REVIEW COMMISSION

2007 FEB 12 PM 3:11

RECEIVED

2559

February 7, 2007

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

This letter concerns the proposed changes to the regulations that affect dogs in puppy mills. We strongly support the changes to the current kennel regulations. As we understand it, the changes would include:

- doubling the minimum cage size
- requiring daily exercise outside of the cage
- requiring heat when the temperature drops below 50 degrees
- requiring cooling (by fan or air conditioning) when the temperature rises above 85 degrees
- improving ventilation in kennel area
- denying kennel licenses to individuals convicted of animal cruelty with the past 10 years.

These changes may help Pennsylvania to lose its reputation as the "puppy mill capital of the East" and will provide better conditions to the dogs who suffer in so many of these 'mills' in our state.

Pat & Dave Fadio
919 Wood Road
Mansfield, PA 16933
Email: pfadio@chilitech.net

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

Hon, Matthew E. Baker
3 East Wing
PO Box 202068
Harrisburg, PA 17120-2068

Joseph B. Scarnati III
Senate District 25
Senate Box 203025
Harrisburg, PA 17120-3025

INDEPENDENT REGULATORY
REVIEW COMMISSION

2007 FEB 12 PM 3:11

RECEIVED

2559

February 6, 2007

Pennsylvania—nicknamed the "puppy mill capitol of the East" because so many puppy mills call the state home.

As a Pennsylvanian and a caring person, I cringe every time I think of this situation, unethical breeders profiting off the misery of puppies and dogs, to such a large degree that the whole country is aware of the plight of these animals, and the apathy of our state towards it. Could it be my cringing days are over?

Thanks to Governor Ed Rendell's commitment to help the tens of thousands of dogs affected by Pennsylvania puppy mills, the issue has been getting a lot of attention. Last December, changes to kennel regulations were proposed that could strengthen the inspection of commercial breeding operations in Pennsylvania, and perhaps help us to lose our shameful nickname.


These changes include:

- ❖ doubling the minimum cage size
- ❖ requiring daily exercise outside of the cage
- ❖ required heat when the temperature drops below 50 degrees
- ❖ required cooling (by fan or air conditioning) when the temperature rises above 85 degrees
- ❖ improving ventilation in kennel areas
- ❖ denying kennel licenses to individuals convicted of animal cruelty within the past 10 years

I strongly support the provisions listed above, and the detailed comments submitted by The Humane Society of the United States.

Additionally, I would mention that, due to the addition of a new definition of "temporary home", you should consider exemption for humane rescue shelters from some of the size and exercise requirements, as well as to foster homes for kennel housing requirements. Instead, a separate set of performance standards appropriate for home care settings - which are rescue-oriented and not commercial breeding operations - should be written.

Thank you for your attention to this matter. Let's hope this is the year we shed our "Puppy Mill capitol of the East" nickname, and do something to improve and enforce kennel conditions.



Sue R. Davenport
1250 Ash Lane
Lebanon, PA 17042

RECEIVED
2007 FEB 12 PM 3:33
INDEPENDENT REGISTRATION
PENNSYLVANIA

2559

Bender, Mary

From: Sweetie5175@aol.com
Sent: Monday, February 05, 2007 10:20 AM
To: mabender@state.pa.us
Subject: (no subject)

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

Dear Ms. Bender:

As a dog lover and an animal advocate, I applaud the steps recently taken by the Dog Law Advisory Board to update the antiquated regulations that have left thousands of PA dogs suffering on a daily basis.

The new regulations, introduced on December 16, 2006, are practical, enforceable, and will greatly improve the quality of life for the dogs living in the commercial breeding kennels. Moreover, those breeders opposing the regulations, based upon the costs they will incur to implement the necessary changes, do not have the dogs' best interest at heart. Clearly, these are the breeders who should be out of the business should they choose not to support or comply with the new regulations; the issue is the health of the dogs - not the money in the breeder's - or dog registry's - pocket.

It is absolutely documented by canine authorities that daily exercise, grooming, proper veterinary care and quality housing all serve to promote canine health and mental balance.

The Bureau has my whole-hearted support to implement the new regulations and to continue policing and shutting down the substandard kennels that have littered our state to such a degree that we're known as the 'Puppy Mill Capital' of the east.

Sincerely,

Melissa Schwefringhaus

no address

INDEPENDENT REGULATORY
REVIEW COMMISSION

2007 FEB 12 PM 2:01

RECEIVED

Nezka Pfeifer
Summit by the Lake
303 Lakewood Manor
Scranton, PA 18505
nezka@juno.com

February 5, 2007

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

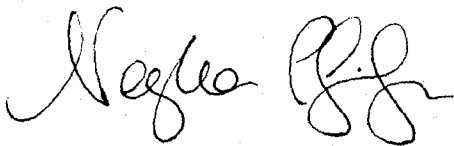
Dear Ms Bender:

I am writing to support the legislative changes to the commercial kennel regulations in Pennsylvania. As a new resident to Pennsylvania, I am dismayed to know that this is "puppy mill capital of the East," especially since, for years, Pennsylvania residents have called upon their legislators and regulators to clean up the cruel puppy mills that brutalize dogs and tarnish the state's image.

The changes suggested last December will improve the outdated kennel regulations used to inspect commercial breeding operations in Pennsylvania. And as a PA resident, I would like my voice to be heard in support of better treatment for dogs in puppy mills. If the proposed regulations are approved, dogs in Pennsylvania puppy mills will be provided with more space, will have better protection from the elements and will have time outside of their cages for exercise.

Thank you very much for your time and consideration, and hope that these changes will be made for the future of all canines in Pennsylvania.

Sincerely,



Nezka Pfeifer

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

RECEIVED
2007 FEB 12 PM 2:26
INDEPENDENT REGULATORY
REVIEW COMMISSION

January 30, 2007

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

RECEIVED
2007 FEB 12 PM 2:21
INDEPENDENT REGULATORY
REVIEW COMMISSION

Dear Ms. Bender:

My name is Ursula Thompson and I'm excited about the new proposed kennel regulations. Dogs are living creatures and it breaks my heart to see them living in hellish conditions and so gruesomely treated.

I would like to thank 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 welcome their passage!

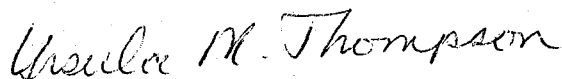
Veterinarian practice, animal behaviorists and other animal care givers have substantiated the type and level of care these animals require for a healthy life. I feel the amended regulations will reflect these current care standards and are necessary to insure ethical and humane conditions needed for better overall quality of life.

Our best friends will truly benefit with larger cages, being removed while cleaning their cages (they could be let out to exercise at this time), and housed in climate controlled areas with ventilation. Denying kennel licenses is a must for those convicted of animal cruelty.

The passage of these kennel regulations will also make Pennsylvania's Department of Agriculture a national leader and diminish Pennsylvania's reputation as "Puppy Mill Capital of the East Coast."

Once again, I support and encourage the proposed kennel regulations!

Sincerely,



Ursula M. Thompson
1 Fahnestock Road
Malvern, PA 19355

Marc & Heather Hoffman

"Bailey's Run"
313 Lower State Road
North Wales, PA 19454-1307 USA
(phone: 215-646-0791)
(fax: 215-628-3034)
(e-mail: lvan313@aol.com)

2559

February 2, 2007

Mary Bender
Department of Agriculture
Bureau of Dog Law Enforcement

Fax: 717-772-4352

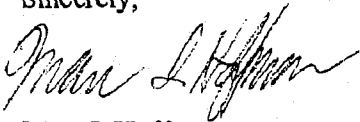
Dear Ms. Bender,

Pennsylvania is known by many as the "puppy mill capital of the East." I have written to my state legislators for years asking for regulations to clean up the cruel puppy mills that brutalize dogs and tarnish the state's image.

Last December, changes were suggested to improve the outdated kennel regulations used to inspect commercial breeding operations in Pennsylvania. If the proposed regulations are approved, dogs in Pennsylvania puppy mills will be provided with more space, will have better protection from the elements and will have time outside of their cages for exercise.

I urge your support of these proposed regulations. They are not only humane but they offer a common-sense approach to the handling of living beings. Thank you for your consideration.

Sincerely,



Marc I. Hoffman

Cc: The Honorable Rick Taylor
PA House of Representatives
Fax: 717-780-4776

Cc: Arthur Coccodrilli, Chairman
Independent Regulatory Review Commission
Fax: 717-783-2664

Cc: The Honorable Stewart Greenleaf
PA Senate
Fax: (717) 783-7328

INDEPENDENT REGULATORY
REVIEW COMMISSION

2007 FEB 12 PM 2:04

RECEIVED

2559

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

RECEIVED

2007 FEB 16 AM 9:48

INDEPENDENT REGULATORY
REVIEW COMMISSION

February 12, 2007

RE: 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.

I fully support ALL of the changes that are being proposed in the current Dog Law regulations. Furthermore, I believe that they could be even stronger, so please do everything in your power to enact the proposed laws.

In addition to the laws you have proposed, please be sure that the cage size requirements are strong enough to ensure that no loopholes can be taken by large commercial breeders, by just adding more dogs to the new cage sizes.

Also, be sure to include excessive matting and excessively long toenails as indicators of proper veterinary care.

The current proposals are a good first step in changing the horrible practices that are currently being done. The puppies in our state's commercial breeding facilities are not keeping in mind the welfare of the animals.

I support any changes that will help the welfare of puppies and dogs in those facilities. Dogs are feeling, breathing, intelligent animals, and deserve a better life than they are currently experiencing in large breeding facilities.

Thank you kindly for your consideration.

Sincerely,



Shanna Blasingame
4836 Andrews Drive
Gibsonia, PA 15044

2559

RECEIVED

IRRC

Attn: Mr. John H. Jewett
14th Floor Harrisstown 2
333 Market St.
Harrisburg, PA 17101

2007 FEB 20 AM 11:16

INDEPENDENT REGULATORY
REVIEW COMMISSION

January 27, 2007

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

Dear Mr. Jewett,

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,

James S. Stoltz Jr.
Lydia Mae Stoltz
Williams Run Kennel
22 William Run Rd
Christiana, PA 17509

621 Knoxlyn-Orrtanna Road
Gettysburg, PA 17325
January 31, 2007

2559

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

INDEPENDENT REGULATORY
REVIEW COMMISSION

2007 FEB 12 PM 2:03

RECEIVED

Dear Ms. Bender:

I am writing to support changes to the amended regulations for Dog Laws in Pennsylvania. I support the efforts of my sister, Jackie King, through the Central PA Animal Alliance in this effort.

Specifically, we would like to support:

1. Doubling or tripling the cage size requirements that currently exist.
2. Providing 30 minutes of exercise twice a day for each dog
3. Providing heat when the temperature is below 50 degrees and Cooling when the temperature goes above 85 degrees
4. Provide lighting and frequent air changes for ventilation
5. Remove all dogs from their cages/ kennels during cleaning
6. Deny kennel licenses for those convicted of animal cruelty Forever
7. Forbid by penalties of law the permanent tethering of a dog or its use as a primary enclosure.

I appreciate the support of the PA Department of Agriculture and Governor Rendell in making these regulations.

Please do everything you can to see that this Regulations are amended, signed into law, and most of all ENFORCED so that dogs can have better lives in our state.

Sincerely,

April Lee Rosensteel
April Lee Rosensteel

2559

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

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

Dear Ms. Bender,

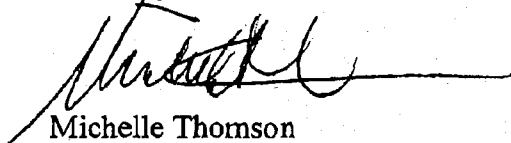
I am writing in support of the proposed regulations which would reduce the suffering of dogs in our state's puppy mills. I particularly support the comments submitted by the Humane Society of the United States.

The updated regulations would:

- Double the minimum cage size;
- Require daily exercise outside the cage;
- Require heat if the temperature drops below 50 degrees;
- Require cooling if the temperature rises above 85 degrees;
- Improve ventilation in kennel areas; and,
- Deny kennel licenses to those convicted of animal cruelty within the past 10 years.

These are minimal benefits that any responsible breeder would provide. The very existence of puppy mills in Pennsylvania is an embarrassment and I would hope that basic concerns for the welfare would enable swift passage of at least minimally protective regulations.

Sincerely,


Michelle Thomson
200 W. Washington Square, Apt. PH-103
Philadelphia, PA 19106

cc: Vincent Fumo, Senate District 1, via email
Babette Josephs, , Philadelphia, via fax: (215) 560-5816, (717) 787-5066
Michael H. O'Brien, Philadelphia, via fax: (215) 503-7850, (717) 780-4787

INDEPENDENT REGULATORY
REVIEW COMMISSION

2007 FEB 12 PM 2:05

RECEIVED

2559

340 Yingling Road
Gettysburg, PA 17325
January 31, 2007

59

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

RECEIVED
2007 FEB 12 PM 2:03
INDEPENDENT REGULATORY
REVIEW COMMISSION

Dear Ms. Bender:

We are writing to support changes to the amended regulations for Dog Laws in Pennsylvania. We support the efforts of our daughter, Jackie King, through the Central PA Animal Alliance in this effort.

Specifically, we would like to support:

1. Doubling or tripling the cage size requirements that currently exist.
2. Providing 30 minutes of exercise twice a day for each dog
3. Providing heat when the temperature is below 50 degrees and Cooling when the temperature goes above 85 degrees
4. Provide lighting and frequent air changes for ventilation
5. Remove all dogs from their cages/ kennels during cleaning
6. Deny kennel licenses for those convicted of animal cruelty Forever
7. Forbid by penalties of law the permanent tethering of a dog or its use as a primary enclosure.

We appreciate the support of the PA Department of Agriculture and Governor Rendell in making these regulations.

Please do everything you can to see that this Regulations are amended, signed into law, and most of all ENFORCED so that dogs can have better lives in this great state.

Thank you,

James E. Myers, Jr.
James E. Myers, Jr. & Margaret Myers

Margaret E. Myers

Isabel Loudig
10 East 16th Street, Apt. 16, New York, NY 10003

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

February 19, 2007

RE: Comments on proposed Dog Law regulations

Dear Ms. Bender,

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 of each dog. However, the provisions regarding orders of veterinary care should be strengthened to state that the owner must provide "proof of *current and proper* veterinary care for the dog." This provision should also be amended to include excessive matting and excessively long toenails as indications of lack of proper veterinary care. Inadequate grooming can lead to painful medical issues for dogs, including skin lesions from excessive matting and leg and joint injuries from failure to keep toenails appropriately trimmed. Moreover, the section should be amended to *require* dog wardens to order a veterinary check on dogs that exhibit signs of infection, contagious disease or parasite; or that appear to be in poor health where proof of current and proper veterinary care is not provided.

5. A new subsection should be added to § 21.30 clarifying the required training for dog wardens. Training in the following areas should be added into the regulations to expand upon the requirements set forth in 3 P.S. § 459-901:

1. State laws relating to dog licensing, control and owner responsibilities;
2. State and federal laws relating to animal care, cruelty and neglect;
3. State laws relating to dangerous dogs;
4. State and federal law relating to lack of arrest powers, proper use of search, seizure and warrants;
5. State and federal laws relating to pounds and shelters;
6. Basics of cruelty and neglect investigations for referral to appropriate authorities;
7. Report-writing and record-keeping;
8. Overview of the legal system, court structure and terminology;
9. Basics of interpreting animal behavior;
10. Identification of injury, disease, abuse and neglect in dogs;
11. Animal hoarders; and
12. Civil liability issues.

6. A new section should be added to the regulations mandating that the Department and dog wardens coordinate and work with law enforcement when applicable. It is imperative that the department work with law enforcement, and specifically Humane Society police officers, to ensure that both the cruelty laws and the Dog Law are adequately enforced.

7. A new section should be added to the regulations requiring that a licensee must have enough employees to carry out the level of husbandry practices and care required by the Act and its regulations. Additionally, the employees who provide for care and husbandry or handle animals should be supervised by an individual who has the knowledge, background, and experience in proper husbandry and care of dogs to supervise others. The licensee must be certain that the supervisor and other employees can perform to such standards.

8. Stacking primary enclosures on top of one another should be prohibited. Stacking cages creates an unnatural environment for the dogs. Additionally, it makes observation of the dogs more difficult and creates sanitation problems. Even with a tray or partition between cages, it is likely that the partitions may overflow, causing feces, urine, food, water, and hair to fall onto the dogs located in the cages below.

9. The section on wire mesh flooring should be amended to make it at least as strict as the federal Animal Welfare Act, which requires that metal strand flooring be greater than one-eighth of an inch in diameter (9 gauge) or coated with a material such as plastic or fiberglass. Language should also be added requiring that all primary enclosures that have wire mesh flooring also have a resting board of sufficient size to allow each dog in the enclosure to lie in a full lateral recumbent position and be able to make normal postural adjustments. Resting boards are necessary to provide for the comfort of the dog and to allow the animal to have some time away from living on grated fencing. Providing resting boards will result in fewer foot lesions and other foot and leg injuries to the dogs. A solid resting surface that is impervious to moisture is also a more natural environment for the animal, provides a draft-free surface and enables the dog to retain its body heat. A dog feels most vulnerable when lying down, and forcing a dog to lie over an exposed area can contribute to anxiety. Humane standards and survival standards are separate, and creating an environment that merely allows for survival does not necessarily make such an environment humane.

10. Contrary to what the breeding industry states, the engineering standards specified in the proposed regulations do have a scientific foundation. The standards in the proposed regulations are more akin to acceptable husbandry practices. They will bring the engineering standards up to par with, if not above, those set forth in the Animal Welfare Act. Contrary to the hobby breeders' contention, the new regulations will not bring hobby breeders under the purview of the Dog Law. Only kennels that keep, harbor, board, shelter, sell, give away, or transfer *a cumulative total of 26 or more dogs* in one calendar year will be required to comply with the new regulations. As a result, true hobby breeders are still exempt from the law. Good husbandry practices dictate that anyone harboring a larger number of dogs (26 or more) should comply with certain engineering standards to ensure the health, safety, and well-being of the dogs. The Dog Law and its regulations are aimed at regulating larger and commercial breeding facilities. Therefore, the new regulations will not affect hobby breeders, contrary to what the breeding community suggests.

Once again, 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 I have noted above will further ensure that such dogs are protected. Thank you for your time and consideration.

Sincerely,

Isabel Loudig
Isabel Loudig

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

February 13, 2007

RE: Comments on proposed Dog Law regulations

Dear Ms. Bender,

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

of each dog. However, the provisions regarding orders of veterinary care should be strengthened to state that the owner must provide "proof of *current and proper* veterinary care for the dog." This provision should also be amended to include excessive matting and excessively long toenails as indications of lack of proper veterinary care. Inadequate grooming can lead to painful medical issues for dogs, including skin lesions from excessive matting and leg and joint injuries from failure to keep toenails appropriately trimmed. Moreover, the section should be amended to *require* dog wardens to order a veterinary check on dogs that exhibit signs of infection, contagious disease or parasite; or that appear to be in poor health where proof of current and proper veterinary care is not provided.

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5. State and federal laws relating to pounds and shelters;
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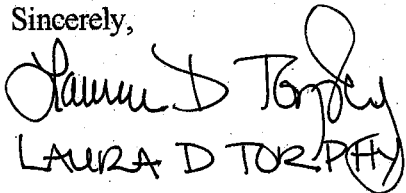
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Once again, I commend the Department of Agriculture and the Bureau of Dog Law Enforcement for proposing regulations that will improve the conditions for dogs housed and bred in Pennsylvania's commercial kennels. The changes I have noted above will further ensure that such dogs are protected. Thank you for your time and consideration.

Sincerely,


LAURA D TORPHY

183 Old Georgetown Road
Princeton, NJ 08540

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

February 19, 2007

RE: Comments on proposed Dog Law regulations

Dear Ms. Bender,

I respectfully submit this comment on the proposed changes to the Dog Law regulations.

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3. State laws relating to dangerous dogs;
4. State and federal law relating to lack of arrest powers, proper use of search, seizure and warrants;
5. State and federal laws relating to pounds and shelters;
6. Basics of cruelty and neglect investigations for referral to appropriate authorities;
7. Report-writing and record-keeping;
8. Overview of the legal system, court structure and terminology;
9. Basics of interpreting animal behavior;
10. Identification of injury, disease, abuse and neglect in dogs;
11. Animal hoarders; and
12. Civil liability issues.

6. A new section should be added to the regulations mandating that the Department and dog wardens coordinate and work with law enforcement when applicable. It is imperative that the department work with law enforcement, and specifically Humane Society police officers, to ensure that both the cruelty laws and the Dog Law are adequately enforced.

7. A new section should be added to the regulations requiring that a licensee must have enough employees to carry out the level of husbandry practices and care required by the Act and its regulations. Additionally, the employees who provide for care and husbandry or

handle animals should be supervised by an individual who has the knowledge, background, and experience in proper husbandry and care of dogs to supervise others. The licensee must be certain that the supervisor and other employees can perform to such standards.


8. Stacking primary enclosures on top of one another should be prohibited. Stacking cages creates an unnatural environment for the dogs. Additionally, it makes observation of the dogs more difficult and creates sanitation problems. Even with a tray or partition between cages, it is likely that the partitions may overflow, causing feces, urine, food, water, and hair to fall onto the dogs located in the cages below.

9. The section on wire mesh flooring should be amended to make it at least as strict as the federal Animal Welfare Act, which requires that metal strand flooring be greater than one-eighth of an inch in diameter (9 gauge) or coated with a material such as plastic or fiberglass. Language should also be added requiring that all primary enclosures that have wire mesh flooring also have a resting board of sufficient size to allow each dog in the enclosure to lie in a full lateral recumbent position and be able to make normal postural adjustments. Resting boards are necessary to provide for the comfort of the dog and to allow the animal to have some time away from living on grated fencing. Providing resting boards will result in fewer foot lesions and other foot and leg injuries to the dogs. A solid resting surface that is impervious to moisture is also a more natural environment for the animal, provides a draft-free surface and enables the dog to retain its body heat. A dog feels most vulnerable when lying down, and forcing a dog to lie over an exposed area can contribute to anxiety. Humane standards and survival standards are separate, and creating an environment that merely allows for survival does not necessarily make such an environment humane.

10. Contrary to what the breeding industry states, the engineering standards specified in the proposed regulations do have a scientific foundation. The standards in the proposed regulations are more akin to acceptable husbandry practices. They will bring the engineering standards up to par with, if not above, those set forth in the Animal Welfare Act. Contrary to the hobby breeders' contention, the new regulations will not bring hobby breeders under the purview of the Dog Law. Only kennels that keep, harbor, board, shelter, sell, give away, or transfer a cumulative total of 26 or more dogs in one calendar year will be required to comply with the new regulations. As a result, true hobby breeders are still exempt from the law. Good husbandry practices dictate that anyone harboring a larger number of dogs (26 or more) should comply with certain engineering standards to ensure the health, safety, and well-being of the dogs. The Dog Law and its regulations are aimed at regulating larger and commercial breeding facilities. Therefore, the new regulations will not affect hobby breeders, contrary to what the breeding community suggests.

Once again, 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 I have noted above will further ensure that such dogs are protected. Thank you for your time and consideration.

Sincerely,


(JUDITH MCLANE)

2559

120 N. 5th St.
Allentown, PA 18102-4108
February 3, 2007

Department of Agriculture
Bureau of Dog Law Enforcement
Attn: Mary Bender
2301 N. Cameron St.
Harrisburg, PA 17110-9408

INDEPENDENT REGULATORY
REVIEW COMMISSION

2007 FEB 12 PM 2:05

RECEIVED

Dear Ms. Bender:

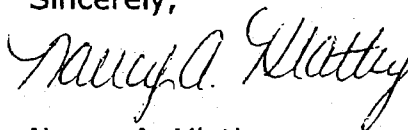
I'm writing out of concern for the tens of thousands of dogs and puppies who suffer tremendously in Pennsylvania's puppy mills. I urge you to support Governor Rendell's commitment to help these dogs and puppies by:

- Doubling the minimum cage size
- Requiring daily exercise outside of the cage
- Require heat when the temperature drops below 50 degrees
- Require cooling (by fan or air conditioning) when the temperature rises above 85 degrees
- Improving ventilation in kennel areas
- Denying kennel licenses to individuals convicted of animal cruelty within the past 10 years

I ask that you consider certain exemptions for shelters from the kennel expansion requirements and that foster homes should be exempt from kennel housing requirements and instead have separate performance standards which are appropriate for home care settings.

I thank you on behalf of all of the dogs and puppies who suffer every minute of every day of their entire life in these horrible puppy mills.

Sincerely,



Nancy A. Hlatky

BERNADINE C. SEMINACK

2559

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 12 PM 2:05

RECEIVED

RE: PA. PUPPY MILLS

Dear Sir:

It is my hope that you join Gov. Ed Rendell in his commitment to help the tens of thousands of dogs affected by Pa. puppy mills. On Dec. 16th changes were proposed to improve antiquated inspections & regulations regarding inspections on breeding operations in Pa. These changes which would improve living conditions of dogs suffering in puppy mills. These changes would include:

- doubling the minimum cage size
- requiring daily exercise outside of the cage
- required heat when the temperature drops below 50 degrees
- required cooling (fan or air conditioning) when temperature rise above 85
- improved ventilation in cages & denying kennel licenses to individuals convicted of animal cruelty within the past 10 years

Also, it is my desire that foster homes should be exempt from kennel housing requirements and instead have *separate* performance standards *appropriate for home care settings*. **Please support this humane treatment of animals in puppy mills.**

Sincerely,

Bernadine Seminack

2559

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

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

INDEPENDENT REGULATORY
REVIEW COMMISSION

2007 FEB 12 PM 2:05

RECEIVED

I would like to voice support for the new, more humane regulations of puppy mills.

- » doubling the minimum cage size
- » requiring daily exercise outside of the cage
- » required heat when the temperature drops below 50 degrees
- » required cooling (by fan or air conditioning) when the temperature rises above 85 degrees
- » improving ventilation in kennel areas
- » denying kennel licenses to individuals convicted of animal cruelty within the past 10 years

I also ask for an exemption for shelters from 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.

Thank you,

Nikki Schmitt

1357 Prospect Rd.
Pittsburgh, PA 15227
Nschmitt26@aol.com

Sherry Frey-Brown
202 Mulberry Place
Douglassville, PA 19518

INDEPENDENT REGULATORY
COMMISSION

2007 FEB 12 PM 2:04

RECEIVED

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

Dear Ms. Bender:

Pennsylvania is known by many as the "puppy mill capital of the East." And for years Pennsylvania residents have called upon their legislators and regulators to clean up the cruel puppy mills that brutalize dogs and tarnish the state's image.

Last December, changes were suggested to improve the outdated kennel regulations used to inspect commercial breeding operations in Pennsylvania. Pennsylvanians are now able to shape the future of puppy mills in PA by sharing their thoughts on those suggested improvements. Since the comment period closes March 16, I wanted to make sure my voice was heard in support of better treatment for dogs in puppy mills. If the proposed regulations are approved, dogs in Pennsylvania puppy mills will be provided with more space, will have better protection from the elements and will have time outside of their cages for exercise.

The proposed changes could improve the living conditions of dogs that currently suffer in puppy mills. With your support, changes to the regulations that affect dogs in puppy mills could include the following requirements:

- » Doubling the minimum cage size
- » Requiring daily exercise outside of the cage
- » Required heat when the temperature drops below 50 degrees
- » Required cooling (by fan or air conditioning) when the temperature rises above 85 degrees
- » Improving ventilation in kennel areas
- » Denying kennel licenses to individuals convicted of animal cruelty within the past 10 years

There has been some concern that animal shelters and rescue groups may be affected by the kennel regulations due to the addition of a new definition of "temporary home." I would like to ask for an exemption for shelters from the kennel expansion and exercise requirements. Also I would like to note that foster homes should be exempt from kennel housing requirements and instead have separate performance standards appropriate for home care settings.

This matter personally affects my husband and I since we have adopted dogs that came from situations of neglect and possible abuse. We do so because we are avid animal lovers who feel all animals need a home, food, medical care and especially love.

We thank you very much for your consideration in helping make Pennsylvania the state that cares about dogs and all animals. Animals are innocent and helpless against people so we need to protect and respect them and their living environment...we need laws to protect them as well.

Best regards,



Sherry Frey-Brown

Jana Lyons
2925 Belrose Ave.
Pittsburgh, PA 15216

2559

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

RECEIVED
2007 FEB 12 PM 2:04
INDEPENDENT REGULATORY
REVIEW COMMISSION

Re: [7 PA. CODE CHS. 21, 23, 25 AND 27], Dog Law Enforcement, [36 Pa.B. 7596],
[Saturday, December 16, 2006]

Dear Ms. Bender:

I am writing to express my support for the proposed changes to the kennel regulations. Until we can get rid of "puppy mills" completely, it's important that they are regulated more closely for the protection of these poor animals. If the proposed regulations are approved, dogs in Pennsylvania puppy mills will be provided with more space, will have better protection from the elements and will have time outside of their cages for exercise.

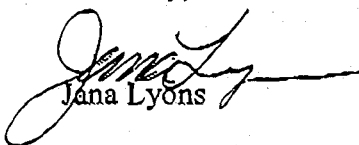
At the very least, we need regulations that call for

- doubling the minimum cage size
- requiring daily exercise outside of the cage
- requiring heat when the temperature drops below 50 degrees
- requiring cooling (by fan or air conditioning) when the temperature rises above 85 degrees
- improving ventilation in kennel areas
- denying kennel licenses to individuals convicted of animal cruelty within the past 10 years

Additionally, please make sure that shelters, which are doing their best to help animals, are not adversely affected by legislation meant to help as well. This could be done by providing an exemption for shelters from the kennel expansion and exercise requirements and by also exempting foster homes should from kennel housing requirements and instead have separate performance standards appropriate for home care settings.

Your support of these efforts is critical. Pennsylvania is great state and it's horrible that we would be known for our cruelty to animals.

Sincerely,


Jana Lyons

2559

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

RECEIVED

2007 FEB 20 AM 11:15

January 27, 2007

INDEPENDENT REGULATORY
REVIEW COMMISSION

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:

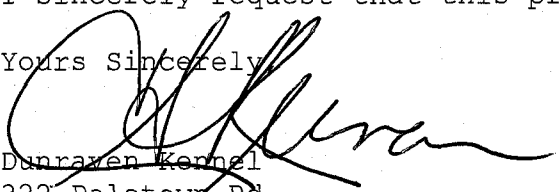
1. Unless the kennel has purchased, sold, or transferred more than 26 dogs in a calendar year to the individual, it is impossible for the kennel to know if the individual is required to have a Pennsylvania kennel license.
2. It is unlawful for the department to regulate and inspect kennels outside of 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,


Dunraven Kennel
322 Paletown Rd
Quakertown, PA 18951

2559

Amy Dietrich
1204 Trexlertown Road
PO Box 613
Trexlertown, PA 18087

February 7, 2007

INDEPENDENT REGULATORY
REVIEW COMMISSION

2007 FEB 12 PM 3:14

RECEIVED

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

Dear Ms. Bender:

I am writing this letter to share my support for the proposed changes to regulations that could improve the living conditions of dogs who currently suffer in puppy mills.

I am in support of the changes listed below to name a few:

- » doubling the minimum cage size
- » requiring daily exercise outside of the cage
- » required heat when the temperature drops below 50 degrees
- » required cooling (by fan or air conditioning) when the temperature rises above 85 degrees
- » improving ventilation in kennel areas
- » denying kennel licenses to individuals convicted of animal cruelty within the past 10 years

I am urging you to support these changes and do all that you can to help the humane treatment of these animals.

Thank you.

Sincerely,


Amy Dietrich

Cc: Arthur Coccodrilli, Chairman Independent Regulatory Review Commission
Cc: Senator Patrick Browne
Cc: Representative Douglas Reichley

KAREN L. VASICAK

265 Watkins Street
Swoyersville, PA 18704

E-Mail: beecuzican@msn.com

Telephone: (570) 331-4081

February 2, 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 12 PM 2:26

RECEIVED

Dear Ms. Bender:

I am a Pennsylvania Resident and I am writing to you today with regard to Governor Ed Rendell's commitment to help the tens of thousands of dogs affected by Pennsylvania puppy mills. As you know, the issue has been getting a lot of attention and I fully support the changes set forth in the PROPOSED RULEMAKING, DEPARTMENT OF AGRICULTURE, [7 PA. CODE CHS. 21, 23, 25 AND 27], Dog Law Enforcement, [36 Pa.B. 7596] [Saturday, December 16, 2006], not limited to, but including, the following requirements:

- (a) doubling the minimum cage size;
- (b) requiring daily exercise outside of the cage;
- (c) required heat when the temperature drops below 50 degrees;
- (d) required cooling (by fan or air conditioning) when the temperature rises above 85 degrees;
- (e) improving ventilation in kennel areas; and
- (f) denying kennel licenses to individuals convicted of animal cruelty within the past 10 years.

The proposed changes could improve the living conditions of dogs who currently suffer in puppy mills. I fully support the new, more humane regulations.

There has been some concern that animal shelters and rescue groups may be affected by the kennel regulations due to the addition of a new definition of "temporary home." Please provide an exemption for shelters from the kennel expansion and exercise requirements. I also believe that foster homes should be exempt from kennel housing requirements and instead have separate performance standards appropriate for home care settings.

Please help these animals who can not help themselves!

THANK YOU!

Sincerely yours,

KAREN L. VASICAK

Karen

Bureau of Dog Law Enforcement
Attn: Mary Bender

RECEIVED

2007 FEB 12 PM 2:26

INDEPENDENT REGISTRY
REVIEW/COMMISSION

Dear HUMAN:

Please help this law pass! These are deplorable, inhumane, disgusting, and HORRIFIC conditions that these poor innocent dogs live it. Cramp, extreme HOT/COLD temperatures, diseases that aren't treated, no human contact, small confining cages that don't even allow them to stand up never mind walk and get exercise!! This is a HORRIBLE and excruciating existence. Have a heart, even though most of you in Congress, the Senate and Gov't tend NOT to have one...Surprise us and give these animals a HUMANE existence!

Please change these regulations! The SOONER THE BETTER for these poor and innocent victims of severe abuse!

- » doubling the minimum cage size
- » requiring daily exercise outside of the cage
- » required heat when the temperature drops below 50 degrees
- » required cooling (by fan or air conditioning) when the temperature rises above 85 degrees
- » improving ventilation in kennel areas
- » denying kennel licenses to individuals convicted of animal cruelty within the past 10 years

Sincerely,

Someone who cares for the animals that cannot speak for themselves.

Allison Griffin
PO Box 31
South Gibson, PA 18842

2559

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

INDEPENDENT REGULATORY
REVIEW COMMISSION

2007 FEB 12 PM 2:01

RECEIVED

Dear Madam:

On Dec. 16, 2006, changes to the outdated kennel regulations—currently used to inspect commercial breeding operations in Pennsylvania—were proposed.

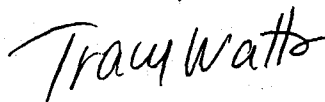
The proposed changes could improve the living conditions of dogs who currently suffer in puppy mills. I am a Pennsylvania resident (and an animal lover) and am submitting a letter to support the new, more humane regulations.

I support the following changes to the regulations that affect dogs in puppy mills:

- doubling the minimum cage size
- requiring daily exercise outside of the cage
- required heat when the temperature drops below 50 degrees
- required cooling (by fan or air conditioning) when the temperature rises above 85 degrees
- improving ventilation in kennel areas
- denying kennel licenses to individuals convicted of animal cruelty within the past 10 years

I am additionally requesting that the above proposed changes include an exemption for shelters from the kennel expansion and exercise requirements and that foster homes should be exempt from kennel housing requirements and instead have separate performance standards appropriate for home care settings.

Sincerely,



Tracy J Watts
338 Arionne Drive
Hatboro, PA 19040

BEVERLY STICKLEY

2033 Rock Fall Road
Harrisburg, Pa. 17110
someone@microsoft.com

RECEIVED

2007 FEB 12 PM 3:13

INDEPENDENT REGULATORY
REVIEW COMMISSION

February 8, 2007

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


Dear Ms. Bender:

For too long, Pennsylvania has been known as the puppy mill capital of the East. For years Pennsylvania residents have called upon their legislators and regulators to clean up the cruel puppy mills that brutalize dogs and tarnish the state's image.

Last December, changes were suggested to improve the outdated kennel regulations used to inspect commercial breeding operations in Pennsylvania. Please put into place rules and regulations that require humane treatment for these animals such as more space, better protection from the elements and outside cages for exercise.

Please help the tens of thousands of dogs who suffer in Pennsylvania puppy mills.

Sincerely,



Beverly Stickle

cc: Arthur Coccodrilli, Chairman, Independent Regulatory Review Commission

2559

RECEIVED

Arthur Coccodrilli, Chairman
Independent Regulatory Review Commission
333 Market St, 14th floor
Harrisburg, Pa 17101

2007 FEB 12 PM 2:38

INDEPENDENT REGULATORY
REVIEW COMMISSION

"Pennsylvania, the puppy mill capital of the nation"*

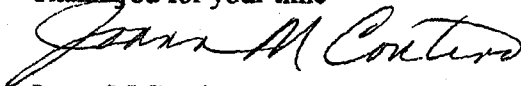
Is this what we are proud of our state to be known as? I think not. There are many good things in Pennsylvania. This is not one of them. Please consider putting into effect the Governor's changes in the Dog Law.

The conditions these animals are kept in is totally inhumane. When people treated others like this in the past they were tried for War Crimes. Even now, if some one is treated like this they are removed and the person treating them is jailed and punished, hopefully. One might say these are just animals, but they are living creatures the same as any. To be able to treat them in this deplorable way is to have no conscience.

The proposed amendments to the dog law are only common sense issues. Any business is required certain guide lines and as this one is working with living creatures; theirs should be more strenuous to ensure a good "product". It is on record that animals raised in these mills have a tendency to suffer from physical, psychological, and behavior problems, many dying shortly after leaving these places.

Please...I urge you to support these measures. If we can treat animals so badly, are people next? Let everyone know that Pennsylvania is the "caring capital of the nation"

Thank you for your time



Joann M Contino
260 Magnolia Court
Bath, Pa 18014
610-837-1001

2/2/2007

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

2559

RECEIVED

2007 FEB 12 PM 2:00

INDEPENDENT REGULATORY
REVIEW COMMISSION

Hello,

I am writing to voice my support for changes in the outdated kennel regulations in Pennsylvania. I also support the detailed comments submitted by The Humane Society of the United States. I believe that the following requirements should be improved:

- doubling the minimum cage size
- requiring daily exercise outside of the cage
- requiring heat when the temperature drops below 50 degrees
- requiring cooling (by fan or air conditioning) when the temperature rises above 85 degrees
- improving ventilation in kennel areas
- denying kennel licenses to individuals convicted of animal cruelty within the past 10 years

The above improvements are a necessity for humane treatment towards dogs.

Subsequently, I would like to recommend that shelters and foster homes be exempt from kennel housing requirements (including kennel expansion and exercise requirements) and instead have separate performance standards appropriate for shelter, or home care settings.

Sincerely,

Brenda Hook

no address

West Chester Pa, 19380

Brenda Hook 2/2/07

2559

RECEIVED

2007 FEB -9 AM 11: 14

INDEPENDENT REGULATORY
REVIEW COMMISSION

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

Liz Neuch
16889 Parker Road
Union City, PA 16438
neuch@verizon.net

Dear Mr. Coccodrilli,

I am writing to ask you to support the proposed changes to the kennel regulations which would greatly improve conditions in Pennsylvania's "puppy mills". Simple decency requires us to provide these dogs with more space, protection from the elements, and especially exercise time outside their cages every day.

I think there should be an exemption for shelters and foster homes because these are run by charitable people who are doing their best to help stray animals as opposed to making a buck off the suffering of animals.

Thank you for considering my comments. I hope decency and kindness will prevail in our dealings with animals.

Sincerely,



Liz Neuch

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

2559

Dear Ms Bender,

I am writing to let you know of my support for the following changes to the outdated kennel regulations:

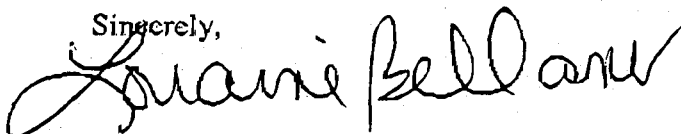
- doubling the minimum cage size
- requiring daily exercise outside of the cage
- required heat when the temperature drops below 50 degrees
- required cooling (by fan or air conditioning) when the temperature rises above 85 degrees
- improving ventilation in kennel areas
- denying kennel licenses to individuals convicted of animal cruelty within the past 10 years
- the detailed comments submitted by The Humane Society of the United States

I am also concerned that the animal shelters and rescue groups may be affected by the kennel regulations due to the addition of a new definition of "temporary home." Please provide an exemption for shelters from the kennel expansion and exercise requirements. Additionally, foster homes should be exempt from kennel housing requirements and instead have separate performance standards appropriate for home care settings.

These changes will improve the living conditions of dogs who suffer in puppy mills. And we as Pennsylvanians will not longer be embarrassed about our puppy mills.

no address Thanks for your support!

Sincerely,



Lorraine Bellano

RECEIVED
2007 FEB 12 PM 2:00
INDEPENDENT REGULATORY
REVIEW COMMISSION

80 Green forest Lane

Lehighton Pa. 18235

February 2, 2007

RECEIVED
2007 FEB 12 PM 2:26
INDEPENDENT REGULATION
REVIEW COMMISSION

To whom it may concern

I am writing on behalf of all the poor animals in the Puppy Mills in Pennsylvania. It has gotten to the point that I am ashamed to say I am from Pennsylvania.

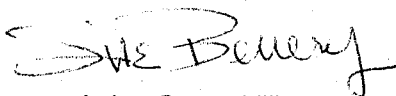
I strongly approve and support the following changes that should be made. I would prefer that they be shut down but in the meantime these new provisions will help

- » doubling the minimum cage size
- » requiring daily exercise outside of the cage
- » required heat when the temperature drops below 50 degrees
- » required cooling (by fan or air conditioning) when the temperature rises above 85 degrees
- » improving ventilation in kennel areas
- » denying kennel licenses to individuals convicted of animal cruelty within the past 10 years

I am also requesting an exemption for shelters from the kennel expansion and exercise requirements I also request that foster homes should be exempt from kennel housing requirements and instead have separate performance standards appropriate for home care settings

Sincerely,

Sue Beveridge



cc: Arthur Coccodrilli

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

February 5, 2007

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. **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.

INDEPENDENT REGULATORY
COMMISSION

2007 FEB 15 AM 10:58

RECEIVED

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 of each dog. However, the provisions regarding orders of veterinary care should be strengthened to state that the owner must provide "proof of *current and proper* veterinary care for the dog." This provision should also be amended to include excessive matting and excessively long toenails as indications of lack of proper veterinary care. Inadequate grooming can lead to painful medical issues for dogs, including skin lesions from excessive matting and leg and joint injuries from failure to keep toenails appropriately trimmed. Moreover, the section should be amended to *require* dog wardens to order a veterinary check on dogs that exhibit signs of infection, contagious disease or parasite; or that appear to be in poor health where proof of current and proper veterinary care is not provided.

5. A new subsection should be added to § 21.30 clarifying the required training for dog wardens. Training in the following areas should be added into the regulations to expand upon the requirements set forth in 3 P.S. § 459-901:

1. State laws relating to dog licensing, control and owner responsibilities;
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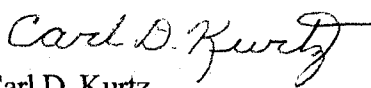
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Sincerely,



Carl D. Kurtz

607 Main St.

Lykens, PA 17048-1310

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

February 13, 2007

RE: Comments on proposed Dog Law regulations

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 Kelly L. Plautz, CPA

KELLY L. PLAUTZ, CPA

13 February 2007

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

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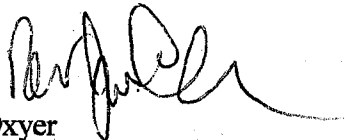
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Rev Jim Oxyer
1210 S Brook St #1
Louisville KY 40203-2789

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

February 19, 2007

RE: Comments on proposed Dog Law regulations

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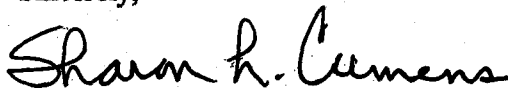
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Sharon L. Cumens
New Holland, PA

Bureau of Dog Law Enforcement
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Attn: Ms. Mary Bender
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Troy, MI 48084

February 19, 2007

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

RE: Proposed Dog Law Regulations

Dear Ms. Bender,

I am writing to encourage and urge to follow through with your proposal regarding long overdue changes in the Dog Law Regulations. As I understand it, the amendments to the Dog Law would improve the condition for dogs that are bred and housed in Pennsylvania commercial breeding facilities; which will be a great advancement and help eliminate some people's conception regarding parts of your state as a haven for "Puppy Mills". I also appreciate the fact that hobby breeders and such will continue to remain exempt under the proposed amended regulations.

More specifically, I fully support the guidelines put forth and already submitted to your agency by the American Society for the Prevention of Cruelty to Animals (ASPCA) on behalf of its membership; which include 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

of each dog. However, the provisions regarding orders of veterinary care should be strengthened to state that the owner must provide "proof of *current and proper* veterinary care for the dog." This provision should also be amended to include excessive matting and excessively long toenails as indications of lack of proper veterinary care. Inadequate grooming can lead to painful medical issues for dogs, including skin lesions from excessive matting and leg and joint injuries from failure to keep toenails appropriately trimmed. Moreover, the section should be amended to *require* dog wardens to order a veterinary check on dogs that exhibit signs of infection, contagious disease or parasite; or that appear to be in poor health where proof of current and proper veterinary care is not provided.

5. A new subsection should be added to § 21.30 clarifying the required training for dog wardens. Training in the following areas should be added into the regulations to expand upon the requirements set forth in 3 P.S. § 459-901:

1. State laws relating to dog licensing, control and owner responsibilities;
2. State and federal laws relating to animal care, cruelty and neglect;
3. State laws relating to dangerous dogs;
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5. State and federal laws relating to pounds and shelters;
6. Basics of cruelty and neglect investigations for referral to appropriate authorities;
7. Report-writing and record-keeping;
8. Overview of the legal system, court structure and terminology;
9. Basics of interpreting animal behavior;
10. Identification of injury, disease, abuse and neglect in dogs;
11. Animal hoarders; and
12. Civil liability issues.

6. A new section should be added to the regulations mandating that the Department and dog wardens coordinate and work with law enforcement when applicable. It is imperative that the department work with law enforcement, and specifically Humane Society police officers, to ensure that both the cruelty laws and the Dog Law are adequately enforced.

7. A new section should be added to the regulations requiring that a licensee must have enough employees to carry out the level of husbandry practices and care required by the Act and its regulations. Additionally, the employees who provide for care and husbandry or handle animals should be supervised by an individual who has the knowledge, background, and experience in proper husbandry and care of dogs to supervise others. The licensee must be certain that the supervisor and other employees can perform to such standards.

8. Stacking primary enclosures on top of one another should be prohibited. Stacking cages creates an unnatural environment for the dogs. Additionally, it makes observation of the dogs

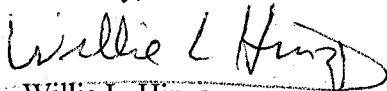
more difficult and creates sanitation problems. Even with a tray or partition between cages, it is likely that the partitions may overflow, causing feces, urine, food, water, and hair to fall onto the dogs located in the cages below.

9. The section on wire mesh flooring should be amended to make it at least as strict as the federal Animal Welfare Act, which requires that metal strand flooring be greater than one-eighth of an inch in diameter (9 gauge) or coated with a material such as plastic or fiberglass. Language should also be added requiring that all primary enclosures that have wire mesh flooring also have a resting board of sufficient size to allow each dog in the enclosure to lie in a full lateral recumbent position and be able to make normal postural adjustments. Resting boards are necessary to provide for the comfort of the dog and to allow the animal to have some time away from living on grated fencing. Providing resting boards will result in fewer foot lesions and other foot and leg injuries to the dogs. A solid resting surface that is impervious to moisture is also a more natural environment for the animal, provides a draft-free surface and enables the dog to retain its body heat. A dog feels most vulnerable when lying down, and forcing a dog to lie over an exposed area can contribute to anxiety. Humane standards and survival standards are separate, and creating an environment that merely allows for survival does not necessarily make such an environment humane.

10. Contrary to what the breeding industry states, the engineering standards specified in the proposed regulations do have a scientific foundation. The standards in the proposed regulations are more akin to acceptable husbandry practices. They will bring the engineering standards up to par with, if not above, those set forth in the Animal Welfare Act. Contrary to the hobby breeders' contention, the new regulations will not bring hobby breeders under the purview of the Dog Law. Only kennels that keep, harbor, board, shelter, sell, give away, or transfer *a cumulative total of 26 or more dogs* in one calendar year will be required to comply with the new regulations. As a result, true hobby breeders are still exempt from the law. Good husbandry practices dictate that anyone harboring a larger number of dogs (26 or more) should comply with certain engineering standards to ensure the health, safety, and well-being of the dogs. The Dog Law and its regulations are aimed at regulating larger and commercial breeding facilities. Therefore, the new regulations will not affect hobby breeders, contrary to what the breeding community suggests.

Again, I applaud your efforts and commend the Department of Agriculture and the Bureau of Dog Law Enforcement for proposing the new regulations that will serve to greatly improve the conditions for dogs housed and bred in Pennsylvania's commercial kennels. The changes noted above will further ensure that such dogs are protected. Many thanks to you and all concerned for your efforts in this regard!

Sincerely,



Willie L. Hinze

1825 Faculty Drive

Winston-Salem, NC 27106

February 19, 2007

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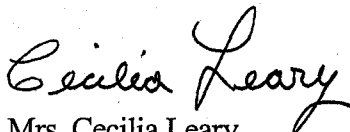
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Once again, I commend the Department of Agriculture and the Bureau of Dog Law Enforcement for proposing regulations that will improve the conditions for dogs housed and bred in Pennsylvania's commercial kennels. The changes I have noted above will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

Sincerely,



Mrs. Cecilia Leary
4700 Beech Crest place
Charlotte, NC 28269

Bureau of Dog Law Enforcement
Pennsylvania Department of Agriculture
Attn: Ms. Mary Bender
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Judith A. Staublin
6115 Woodmont Blvd.
Norcross, GA 30092-2758
770-449-9139

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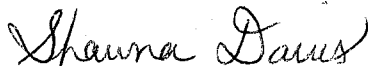
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Shawna Davis
Hc 82 Box 112B

Spurlockville, WV 25565
(304) 524-2246

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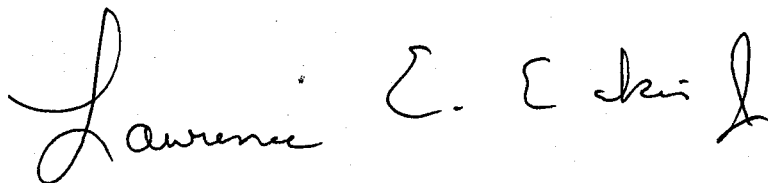
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Lawrence E. Eakin, Jr.
1011 Sheriff's Court
McMurray, PA 15317-2754

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

February 13, 2007

RE: Comments on proposed Dog Law regulations

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Barbara Juknialis
16123 Huntmere Avenue
Cleveland OH 44110

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

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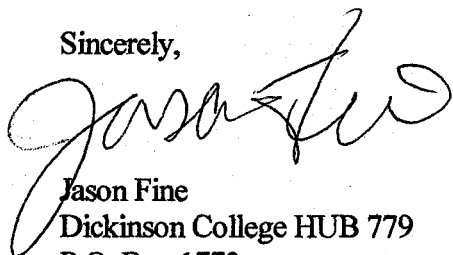
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Dickinson College HUB 779
P.O. Box 1773
Carlisle, PA 17013

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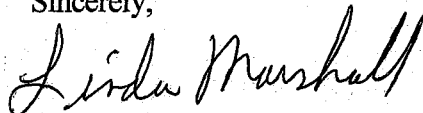
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Ms. Linda Marshall
818 Windsor Road
Arnold, MD 21012

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

February 13, 2007

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Mrs. Lori Georges
4 Ashford Ct
Sayreville, NJ 08872

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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.
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of each dog. However, the provisions regarding orders of veterinary care should be strengthened to state that the owner must provide "proof of *current and proper* veterinary care for the dog." This provision should also be amended to include excessive matting and excessively long toenails as indications of lack of proper veterinary care. Inadequate grooming can lead to painful medical issues for dogs, including skin lesions from excessive matting and leg and joint injuries from failure to keep toenails appropriately trimmed. Moreover, the section should be amended to *require* dog wardens to order a veterinary check on dogs that exhibit signs of infection, contagious disease or parasite; or that appear to be in poor health where proof of current and proper veterinary care is not provided.

5. A new subsection should be added to § 21.30 clarifying the required training for dog wardens. Training in the following areas should be added into the regulations to expand upon the requirements set forth in 3 P.S. § 459-901:

1. State laws relating to dog licensing, control and owner responsibilities;
2. State and federal laws relating to animal care, cruelty and neglect;
3. State laws relating to dangerous dogs;
4. State and federal law relating to lack of arrest powers, proper use of search, seizure and warrants;
5. State and federal laws relating to pounds and shelters;
6. Basics of cruelty and neglect investigations for referral to appropriate authorities;
7. Report-writing and record-keeping;
8. Overview of the legal system, court structure and terminology;
9. Basics of interpreting animal behavior;
10. Identification of injury, disease, abuse and neglect in dogs;
11. Animal hoarders; and
12. Civil liability issues.

6. A new section should be added to the regulations mandating that the Department and dog wardens coordinate and work with law enforcement when applicable. It is imperative that the department work with law enforcement, and specifically Humane Society police officers, to ensure that both the cruelty laws and the Dog Law are adequately enforced.

7. A new section should be added to the regulations requiring that a licensee must have enough employees to carry out the level of husbandry practices and care required by the Act and its regulations. Additionally, the employees who provide for care and husbandry or handle animals should be supervised by an individual who has the knowledge, background, and experience in proper husbandry and care of dogs to supervise others. The licensee must be certain that the supervisor and other employees can perform to such standards.

8. Stacking primary enclosures on top of one another should be prohibited. Stacking cages creates an unnatural environment for the dogs. Additionally, it makes observation of the dogs

more difficult and creates sanitation problems. Even with a tray or partition between cages, it is likely that the partitions may overflow, causing feces, urine, food, water, and hair to fall onto the dogs located in the cages below.

9. The section on wire mesh flooring should be amended to make it at least as strict as the federal Animal Welfare Act, which requires that metal strand flooring be greater than one-eighth of an inch in diameter (9 gauge) or coated with a material such as plastic or fiberglass. Language should also be added requiring that all primary enclosures that have wire mesh flooring also have a resting board of sufficient size to allow each dog in the enclosure to lie in a full lateral recumbent position and be able to make normal postural adjustments. Resting boards are necessary to provide for the comfort of the dog and to allow the animal to have some time away from living on grated fencing. Providing resting boards will result in fewer foot lesions and other foot and leg injuries to the dogs. A solid resting surface that is impervious to moisture is also a more natural environment for the animal, provides a draft-free surface and enables the dog to retain its body heat. A dog feels most vulnerable when lying down, and forcing a dog to lie over an exposed area can contribute to anxiety. Humane standards and survival standards are separate, and creating an environment that merely allows for survival does not necessarily make such an environment humane.

10. Contrary to what the breeding industry states, the engineering standards specified in the proposed regulations do have a scientific foundation. The standards in the proposed regulations are more akin to acceptable husbandry practices. They will bring the engineering standards up to par with, if not above, those set forth in the Animal Welfare Act. Contrary to the hobby breeders' contention, the new regulations will not bring hobby breeders under the purview of the Dog Law. Only kennels that keep, harbor, board, shelter, sell, give away, or transfer *a cumulative total of 26 or more dogs* in one calendar year will be required to comply with the new regulations. As a result, true hobby breeders are still exempt from the law. Good husbandry practices dictate that anyone harboring a larger number of dogs (26 or more) should comply with certain engineering standards to ensure the health, safety, and well-being of the dogs. The Dog Law and its regulations are aimed at regulating larger and commercial breeding facilities. Therefore, the new regulations will not affect hobby breeders, contrary to what the breeding community suggests.

Once again, 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 I have noted above will further ensure that such dogs are protected. Thank you for your time and consideration.

Sincerely,



Stanley R. Charles
442 Farm Branch Drive
Fort Mill, S.C. 29715

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

February 19, 2007

RE: Comments on proposed Dog Law regulations

Dear Ms. Bender,

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.**

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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

of each dog. However, the provisions regarding orders of veterinary care should be strengthened to state that the owner must provide "proof of *current and proper* veterinary care for the dog." This provision should also be amended to include excessive matting and excessively long toenails as indications of lack of proper veterinary care. Inadequate grooming can lead to painful medical issues for dogs, including skin lesions from excessive matting and leg and joint injuries from failure to keep toenails appropriately trimmed. Moreover, the section should be amended to *require* dog wardens to order a veterinary check on dogs that exhibit signs of infection, contagious disease or parasite; or that appear to be in poor health where proof of current and proper veterinary care is not provided.

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Sincerely,



Joyce Janicki
22493 Milner
St. Clair Shores, MI 48081

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

February 13, 2007

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Sincerely,

Rebecca M. Bell

2559

Rec'd 2/19/07

February 19, 2007

Dog Law Bureau Director, Independent Regulatory Review Commission:

I have fostered some of the dogs that came from puppy mills. It is so very sad to see how they are affected from the treatment they received in the Mills. It takes much time and love and patience to rehabilitate them. I am appalled at the conditions I have seen these dogs in. They have been covered with feces and urine, matted, and in general just depressed from the terrible conditions they have been forced to endure. No animal should have to live like this!

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.

Please take action and make these changes to give these dogs the simple gift of warmth, cleanliness, a little exercise and some loving human contact. These are creatures that feel pain, cold, heat, just as we do.

I am asking you please to take action to help them out. The power is in your hands. Please look into your heart, and make these needed changes.

Thank you,

JA Ross
JA Ross
5512 Folkstone Rd.
Pfafftown, NC 27040

2559

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

RECEIVED

2007 FEB 21 AM 10:08

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 Animal House
Everglade Rd
Greensburg, PA 15601

Marcell Waldman
Nila Weldon

2559

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

RECEIVED

2007 FEB 21 AM 10:08

January 31, 2007

INDEPENDENT REGULATORY
REVIEW COMMISSION

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:

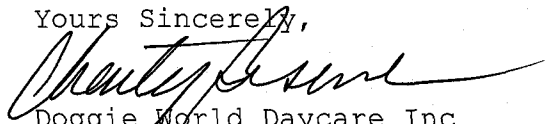
1. Unless the kennel has purchased, sold, or transferred more than 26 dogs in a calendar year to the individual, it is impossible for the kennel to know if the individual is required to have a Pennsylvania kennel license.
2. It is unlawful for the department to regulate and inspect kennels outside of 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,


Doggie World Daycare Inc
858-62 N. 3rd St
Philadelphia, PA 19123