

2559

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

RECEIVED

2007 FEB 20 AM 11:16

INDEPENDENT REGULATORY  
REVIEW COMMISSION

January 24, 2007

Dear Chairman Coccodrilli,

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

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

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

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 I urge that this proposal be rescinded and an approach similar to the USDA standards be developed.

Yours truly,



Pets Plus Horsham, Inc  
200 Blair Mill Rd  
Horsham, PA 19044

2559

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

RECEIVED

2007 FEB 20 AM 11:16

INDEPENDENT REGULATORY  
REVIEW COMMISSION

January 22, 2007

Dear Chairman Coccodrilli,

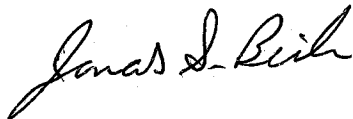
I am writing to comment on the proposed amendments to the Dog Law Regulations Act 225 issued on December 16, 2006. I personally think that many of the changes are impractical and burdensome, and will not improve the quality of life for dogs in kennels.

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

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

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

Yours truly,



Pequea Kennel  
196 Blank Rd  
Narvon, PA 17555

February 12, 2007

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

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

Dear Ms. Bender and Mr. Coccodrilli:

First, I would like to thank Governor Ed Rendell for his commitment to help the tens of thousands of dogs who suffer in Pennsylvania puppy mills. I volunteer with an animal rescue group in Central New Jersey who has fostered some of the dogs surrendered by the mills. I'll spare you the gory details as I'm sure you've heard it all, but suffice it to say that the stories you have heard are most definitely true.

The reason for this letter is to show my support for the proposed changes to the outdated kennel regulations currently used to inspect commercial breeding operations in Pennsylvania. Specifically, I strongly support the following changes:

- More specific and more stringent food, water, bedding and sanitation requirements to address the control of contagious diseases and to assure dogs have access to water at all times;
- Doubling the minimum cage size;
- Heat when temperatures drop below 50 degrees;
- Cooling by air conditioning or fan when temperatures rise above 85 degrees;
- Improved ventilation in kennel areas; and
- Denying kennel licenses to individuals convicted of animal cruelty within the past 10 years.

In addition, I urge you to seriously consider the detailed comments submitted by the Humane Society of the United States.

I am concerned, however, that animal shelters and animal rescue groups may be affected by the kennel regulations due to the addition of a new definition for "temporary home." Therefore, I would ask that shelters be exempt from the kennel expansion and exercise requirements, as well as foster homes be exempt from kennel housing requirements and instead have separate performance standards appropriate for a home care setting.

By copy of this letter, I am asking my state Senator and Representative for their support in favor of the proposed changes to the regulations.

I hope and pray that the support of this letter and letters like it will urge the State of Pennsylvania to enact the changes to the outdated kennel regulations, with the exception of animal shelters and rescue groups as noted above. Is it too much to ask for a little sanitation, comfort, fresh food and water for the animals that are making these millers so much money? I don't think so. I hope you don't either.

Sincerely,



Janice Martino

/jm

cc:

Senator Walter Kavanaugh  
Assemblyman Kip Bateman

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

January 26, 2007

Dear Ms. Bender,

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

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

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

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

Yours truly,

Roles Two Top Kennels  
14357 Ft. Loudon Rd  
Mercersburg, PA 17236

February 5, 2007

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

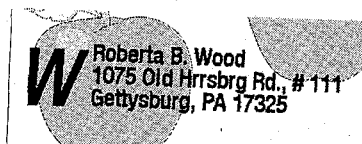
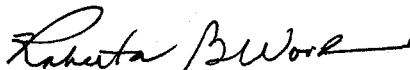
Dear Ms. Bender:

I am writing to you in reference to the new legislation being proposed by lawmakers in PA in an effort to improve the living conditions of animals that live in commercial breeding facilities. I would like to applaud your efforts and thank you for your work on behalf of those who have no voice.

I am writing to enthusiastically support this legislation. It is my hope that legislators will not bend to the special interests of groups who are allowing their collective financial self-interest to supercede the overall welfare of the dogs that live in these commercial breeding facilities. As you are well aware, many of these dogs spend **years** living in cramped cages with little or no medical care, no good nutrition, no socialization and no opportunity for regular exercise. It is unfortunate indeed that some turn a blind eye to the suffering of these helpless animals. I fully realize that these are the facilities that this legislation is intended to regulate more effectively.

Once again, I applaud your efforts on behalf of the helpless animals that are suffering in the state of PA at this very moment due to the greed of certain individuals. I hope that you will work tirelessly to see to it that this legislation can be passed and become law. It is my hope that the final legislation will not interfere with the work of shelters and rescues who are already working tirelessly on behalf of animals. That being said, I would like to once again express my support of this legislation.

Most sincerely,



**W** Roberta B. Wood  
1075 Old Hrrsbrg Rd., # 111  
Gettysburg, PA 17325

2559

Esther Brodsky and Karen Yannetta  
59003 Delaire Landing Road  
Philadelphia, PA 19114

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2007 MAR -1 PM 1:39

INDEPENDENT REGULATORY  
REVIEW COMMISSION

February 16, 2007

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

Dear Chairman Coccodrilli:

We are writing to express support for the proposed changes to regulations currently used to inspect commercial breeding operations in Pennsylvania. As a state resident and as a dog rescue volunteer, we see the sad and inhumane results of inadequate care for animals.

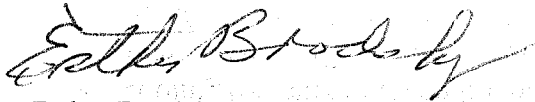
Some of the most basic requirements to be addressed include:

- daily exercise outside of the cage
- heat when the temperature drops below 50 degrees
- 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

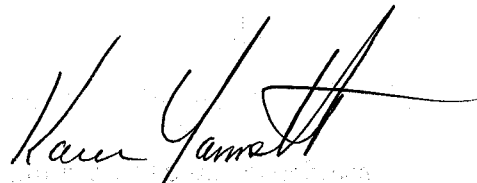
Please also consider allowing an exemption for shelters from the kennel expansion requirements.

Thank you.

Sincerely,



Esther Brodsky



Karen Yannetta

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IRRC

Attn: Mr. John H. Jewett  
14<sup>th</sup> Floor Harristown 2  
333 Market St.  
Harrisburg, PA 17101

2007 MAR -1 PM 1:39

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 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,



Paul Zook  
149 Sawmill Rd  
Belleville, PA 17004



2/3/07

Pennsylvania Department of Agriculture

Bureau of Dog Law Enforcement

Attn: Ms. Mary Bender

2301 North Cameron Street

Harrisburg, PA 17110-9408

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

Dear Ms. Bender:

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

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

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

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

**"Double the cage requirements that currently exist"**

**"Provide 20 min of daily exercise for each dog"**

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

**"Provide better lighting and frequent air changes for ventilation"**

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

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

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

**"Permanent tethering cannot be used as the primary enclosure"**

Thank you for your time and consideration in this matter.

Sincerely,

Todd J. Feddock, DMD



2559

Dear Independent Regulatory Review Commission:

I strongly 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. As an owner of a precious dog born in these horrific conditions, I am a daily witness to the suffering she endured and the lifetime effects.

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

It is a profound embarrassment that Pennsylvania is known as the Puppy Mill Capital of the East Coast and until this is changed, no members of my family will travel to Pennsylvania.

PLEASE take steps to ensure that the new regulations provide humane conditions for the dogs and that the new regulations be enforced. Thank you.

*Janet M. Carothers*

Janet M. Carothers

16623 Saddlewood Drive

Lockport, IL 60441

INDEPENDENT REGULATORY  
REVIEW COMMISSION

2007 FEB 29 AM 8:25

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2007 MAR -1 PM 1:39

INDEPENDENT REGULATORY  
REVIEW COMMISSION

February 26, 2007

Ronald T. Winkler  
6108 Dalmatian Drive  
Bethel Park, PA 15102-4010

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

Dear Chairman Coccodrilli:

This is in support of the stronger regulations for more humane treatment of the animals in Pennsylvania's "puppy mills." As a citizen of the state of Pennsylvania and in the name of decency, we must legislate and enforce these regulations that would require more humane living conditions of these defenseless dogs. The epidemic of inbred canine ailments, diseases, and distemper (among the few products of these mass breeding grounds) must be recognized and stopped, not only for the good of the animals being abused in these facilities, but also for the people who, knowingly or not, become owners of the distressed dogs that are mass-produced in the puppy mills.

I would also like to voice my support for the detailed comments submitted by The Humane Society of the United States with regards to these new regulations against the abhorrent treatment of dogs in these puppy mills.

Our state's unfortunate reputation as leader in the puppy mill industry is unconscionable and irresponsible. Please ensure that your leadership brings about a positive change to the conditions in these facilities.

Sincerely,



Ronald T. Winkler

2559

February 24, 2007

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2007 MAR -1 PM 1:39

President George Bush  
The White House  
1600 Pennsylvania Avenue NW  
Washington, DC 20500

Senator Arlen Specter  
US Senate  
711 Hart Senate Office Building  
Washington, DC 20510-0001

Senator Robert Casey  
B-40 Dirksen Senate Office  
Building  
Washington, DC 20510-0001

INDEPENDENT REGULATORY  
REVIEW COMMISSION

Representative Tim Murphy  
US House of Representatives  
322 Cannon House Office Bldg.  
Washington, DC 20510-0001

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

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

Dear Legislators and Regulators:

I am a Pennsylvania resident who wants to help the tens of thousands of dogs who suffer in Pennsylvania puppy mills. Pennsylvania is known by many as the "puppy mill capital of the East" and that is a title I don't want my state or any other state in these United States to hold! Until we can totally eliminate these cruel puppy mills, I am calling upon you to help clean up the mills that brutalize dogs and tarnish my state's image.

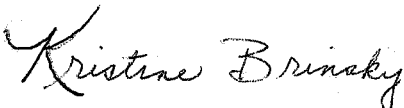
One of my family's most beloved pets was a Scottish Terrier named Duffy. We "rescued" him from a pet store that we later found out went to these ridiculous mills to get their puppies. He suffered from health problems all of his life because of the terrible environment in which he was born and raised until we found him. I don't want any animal to be raised in such dreadful conditions.

I was glad to hear that last December, changes were suggested to improve the outdated kennel regulations used to inspect commercial breeding operations in Pennsylvania. The proposed changes would improve the living conditions of dogs who currently suffer. With your support, changes to the regulations that affect dogs in these needless 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—very important!!

I donate to the HSUS and I know they share my concerns. I ask you to give an exemption for shelters from the kennel expansion and exercise requirements as well as an exemption to foster homes from kennel housing requirements and instead have separate performance standards appropriate for home care settings.

Respectfully,



Kristine Brinsky  
Bethel Park, PA

February 5, 2007

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

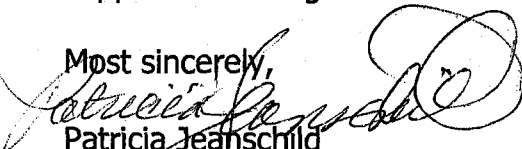
Dear Ms. Bender:

I am writing to you in reference to the new legislation being proposed by lawmakers in PA in an effort to improve the living conditions of animals that live in commercial breeding facilities. I would like to applaud your efforts and thank you for your work on behalf of those who have no voice.

I am writing to enthusiastically support this legislation. It is my hope that legislators will not bend to the special interests of groups who are allowing their collective financial self-interest to supercede the overall welfare of the dogs that live in these commercial breeding facilities. As you are well aware, many of these dogs spend **years** living in cramped cages with little or no medical care, no good nutrition, no socialization and no opportunity for regular exercise. It is unfortunate indeed that some turn a blind eye to the suffering of these helpless animals. I fully realize that these are the facilities that this legislation is intended to regulate more effectively.

Once again, I applaud your efforts on behalf of the helpless animals that are suffering in the state of PA at this very moment due to the greed of certain individuals. I hope that you will work tirelessly to see to it that this legislation can be passed and become law. It is my hope that the final legislation will not interfere with the work of shelters and rescues who are already working tirelessly on behalf of animals. That being said, I would like to once again express my support of this legislation.

Most sincerely,



Patricia Jeanschild  
126 E. Brown St.  
East Stroudsburg, Pa. 18301

2559

6 February 2007  
Department of Agriculture  
Bureau of Dog Law Enforcement  
Attn: Mary Bender  
2301 North Cameron Street  
Harrisburg, PA 17110-9408

RECEIVED

2007 FEB -9 AM 11: 11

INDEPENDENT REGULATORY  
REVIEW COMMISSION

Hello!

I am writing in support of proposed changes to kennel regulations including:

- » 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

In general, I believe we must end the shameful treatment of all animals; including those raised as a food source. We need not torture animals before we eat them.

Regards,  
Michael Frailey

Cc Arthur Coccodrilli, Chairman  
Independent Regulatory Review Commission

Senator Gibson E. Armstrong

Hon. John C. Bear

2559

C. Kathleen Jordan  
1930A Green Street  
Philadelphia, PA 19130  
[greenstct1@aol.com](mailto:greenstct1@aol.com)

RECEIVED

2007 FEB -9 AM 11: 13

INDEPENDENT REGULATORY  
REVIEW COMMISSION

Sunday, February 4, 2007

Arthur Coccodrilli, Chairman  
Independent Regulatory Review Commission  
333 Market Street, 14<sup>th</sup> floor  
Harrisburg, PA 17101

Dear Mr. Coccodrilli:

This letter is to support the long overlooked and outdated kennel regulations that have been proposed. Tens of thousands of dogs have suffered cruel and inhumane lives because of the old laws. I support changes to the regulations that affect dogs in puppy mills including 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.
- Improved ventilation in kennel areas
- Denying kennel licenses to individuals convicted of animal cruelty within the past 10 years.
- Enforcement of these changes

In addition to the provisions above, I also support the detailed comments submitted by The Humane Society of the United States.

However, I do ask for an exemption for shelters from the kennel expansion and exercise requirements. Foster homes should also be exempt from kennel housing requirements and instead have separate performance standards appropriate for shelters and home care settings. We cannot afford to loose foster homes in the effort to save more lives and prevent cruelty.

Your support of the new laws where animals will be treated with respect and a conscience, and not be subject to harm and cruelty is requested. Should you need to contact me, I can be reached at the email address noted above.

Cordially,



C. Kathleen Jordan

cc: Department of Agriculture, Mary Bender

**2559****Dog Law Bureau Director, Independent Regulatory Review Commission:**

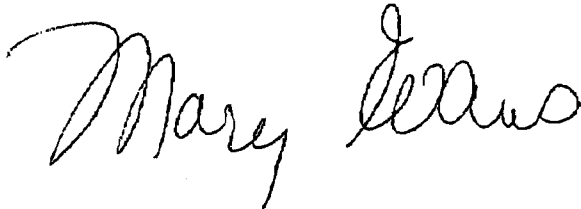
I support the changes to the commercial dog regulations submitted by the Coalition Against Misery. The proposed regulations by the Pennsylvania Department of Agriculture that were recently published in the Pennsylvania Bulletin do not adequately address the issues of temperature control, cage conditions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

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

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

I have been an animal advocate for many years and have contributed hundreds of dollars to different organizations to help endangered, abused and neglected animals. Nothing to date tops the problems seen in your state. I cannot believe this is allowed in a nation committed to freedom. This is appalling. I made the trip in August 2006 to protest Puppy Mills in your state. I plan to be there again this year. I know you have a lot of work to clean up the mess that has been allowed to happen in your state.

**PLEASE HELP THESE ANIMALS to live a clean, healthy life. They did not ask to be born in these conditions. Only you can help stop this atrocity.**



**Mary Evans**

**152 Windsong Hts  
Weare, NH 03281  
Email: [chloeev@msn.com](mailto:chloeev@msn.com)  
Phone: 603-529-4226**

RECEIVED  
2007 FEB -9 AM 11:18  
INDEPENDENT REGULATORY  
REVIEW COMMISSION



2559

RECEIVED

2007 FEB -9 AM 11:

Amanda Harber  
3303 Parkview Ave.  
Pittsburgh, PA 15213

INDEPENDENT REGULATORY  
REVIEW COMMISSION

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

February 4, 2007

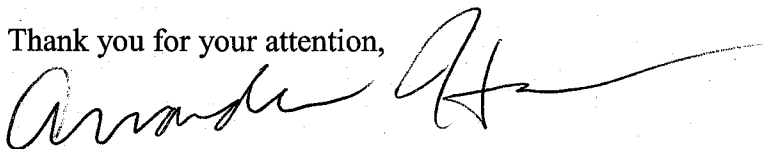
Dear Mr. Coccodrilli:

I strongly support the proposed changes to Pennsylvania's kennel regulations, including doubling cage size, requiring exercise outside of the cage, humane heating and cooling, improved ventilation, and especially the denial of a kennel license to anyone convicted of animal cruelty. These are smart, necessary laws that will hopefully end Pennsylvania's unfortunate reputation of as the Puppy Mill Capital of the east.

However, I think it is necessary to consider the special case of animal shelters. These shelters have fiscal restraints in regards to providing larger cages for animals, although it may be worthwhile to state that shelters must include these improvements in their long range plans.

Changing Pennsylvania's kennel regulations will be a proud day for all Pennsylvanians. I eagerly await the day that the suffering of dogs in puppy mills ends.

Thank you for your attention,



Amanda Harber

CC: State Representative Jake Wheatley, Jr. State Senator Jim Ferlo

2559

RECEIVED

Nora Ventresca  
110 Decatur Street  
Doylestown, PA 18901

2007 FEB -9 AM 11: 11

INDEPENDENT REGULATORY  
REVIEW COMMISSION

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

February 5, 2007

Dear Ms. Bender:

I am writing to you today to urge you to adopt stricter and more humane legislation regarding puppy mills in the State of Pennsylvania. No doubt you are well aware of the horrible conditions at many of these puppy mills.

These innocent dogs, who deserve a life so much better than the one fate has handed them, are counting on you to help them. All you have to do is look into one set of these big, brown, helpless eyes and the answer is clear:

Stop the Puppy Mills or at LEAST enforce humane regulations at these places. You have the power to do something, so please do it.

Thank you,



Nora Ventresca

Cc: Arthur Coccodrilli, Independent Regulatory Review Commission ✓  
Edward Rendell, Governor, State of Pennsylvania

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2007 FEB -9 AM 11: 11

INDEPENDENT REGULATORY  
REVIEW COMMISSION

Dear Mr. Coccodrilli,

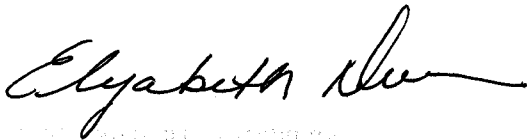
February 5, 2007

I am writing in support of the more humane regulations proposed to alter the unethical and outdated current kennel regulations. Pennsylvania's puppy mill industry displays a side of humanity that needs correction not only for the animals doomed to these horrific lives but to avoid the erosion of our current sense of overall ethics.

We hear on a regular basis that we need to improve our country's image throughout both our own borders and throughout the world. However if we allow cruelty, of any type to flourish, such as the current status of puppy mills has we encourage and endorse this behavior.

I greatly appreciate your time and your support of this issue.  
Please feel free to contact me with any questions or concerns you may have.

Sincerely,



Elizabeth Duncan

Elizabeth C. Duncan  
702 Stutzman Rd.  
Indiana, PA, 15701  
bduncan@arin.k12.pa.us

2559

January 24, 2007

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

RECEIVED

2007 FEB -9 AM 11: 11

INDEPENDENT REGULATORY  
REVIEW COMMISSION

Dear Chairman Coccodrilli,

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

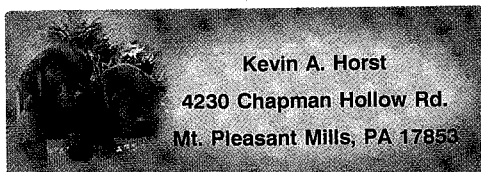
As a Pennsylvania breeder, my goal and the goal of other law-abiding breeders is to raise the best quality and healthiest puppy possible. This is not the issue. Unfortunately, the issue created by this proposal is my rights as a citizen of this state to own property, and my rights to be afforded due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

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

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

Sincerely,

*Kevin A. Horst*



Gov. Ed Rendell  
225 Main Capitol Building  
Harrisburg, PA 17120

February 9, 2007

Dear Gov. Rendell:

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

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

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

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

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

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

I strongly urge that this proposal be withdrawn.

Sincerely,



Bonita C. Sukus  
12 Carey Lane  
Jenkins Township, PA 18640

cc: Raphael Musto, State Senator  
Robert Mellow, State Senator  
James Wasacz, State Representative  
Mike Carroll, State Representative

✓ MARY BENDER

**Locust Grove Kennel  
17111 Dry Run Road South  
Dry Run, PA 17220**

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

January 31, 2007

Dear Ms. Bender,

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

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

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

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

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

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

Yours Sincerely, *Henry Byler*

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

January 20, 2007

Dear Ms. Bender,

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

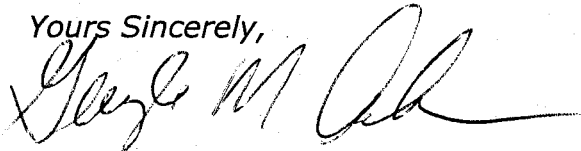
*The proposed changes would require the kennel owner to record every time a water bowl or food pan is washed, every time the primary and secondary pen enclosures are cleaned, the feeding and watering dates and times, etc. These excessive and burdensome requirements will require a substantial increase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

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

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

*I sincerely urge that this proposal be rescinded.*

*Yours Sincerely,*



Gaylee Kennels  
651 Abel Colony Rd  
Wind Gap, PA 18091

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

January 31, 2007

Dear Ms. Bender,

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

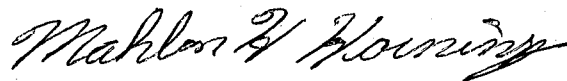
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I sincerely urge that this proposal be rescinded.

Yours Sincerely,



Mahlon H. Horning  
2140 Mensch Rd.  
Mifflinburg, PA 17844



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

January 31, 2007

Dear Ms. Bender,

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I sincerely urge that this proposal be rescinded. !

Yours Sincerely,

*Phares Horning !*

Phares Horning  
2140 Mensch Rd  
Mifflinburg, PA 17844

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

January 20, 2007

Dear Ms. Bender,

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I sincerely urge that this proposal be rescinded.

Yours Sincerely,



Gerri Kelly's Classical Canines  
9760 Concord Rd  
Union City, PA 16438

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

January 22, 2007

Dear Ms. Bender,

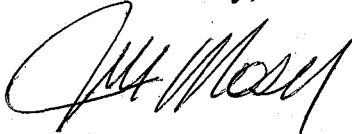
I am writing to comment on the proposed amendments to the Dog Law Regulations Act 225 issued on December 16, 2006. I personally think that many of the changes are impractical and burdensome, and will not improve the quality of life for dogs in kennels.

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

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

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

Yours truly,



Pet King Pet Center  
RR2 Bx 27 Rt 61  
Shamokin, PA 17872

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

January 31, 2007

Dear Ms. Bender,

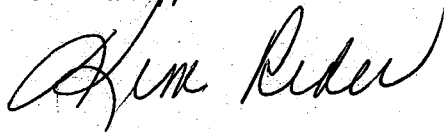
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Yours truly,



Riders Boarding Kennel  
101 Pringle Rd  
Smithfield, PA 15478

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

January 27, 2007

Dear Ms. Bender,

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

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,

  
R. W. Reichardt  
Worthy Way Beagles  
365 Rich Hill Rd  
Sellersville, PA 18960

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

January 31, 2007

Dear Ms. Bender,

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

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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,



Noah S. Zimmerman  
Rd #1 Box 65  
Martinsburg, PA 16662

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

January 31, 2007

Dear Ms. Bender,

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

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

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

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

Yours truly,

*Patricia Santi*

Rhydowen Kennel  
173 Union Rd  
Coatesville, PA 19320

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

January 27, 2007

Dear Ms. Bender,

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

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.

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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,

*David W. Stoltz, Jr.*

Williams Run Kennel  
84 Williams Run Rd  
Christiana, PA 17509



2559

FEBRUARY 13, 2007

DEPARTMENT OF AGRICULTURE  
BUREAU OF DOG LAW ENFORCEMENT  
ATTN: MARY BENDER  
2301 NORTH CAMERON STREET  
HARRISBURG, PA 17110-4352

RECEIVED

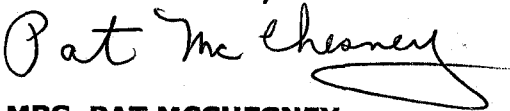
2007 FEB 21 AM 10:09

INDEPENDENT REGULATORY  
REVIEW COMMISSION

I AM WRITING REGARDING THE CLEANING UP OF THE PUPPY MILLS IN OUR STATE. IT IS A DISGRACE THAT OUR STATE IS BEING CALLED THE "PUPPY MILL CAPITAL OF THE EAST". IT IS TIME TO IMPROVE THE OUTDATED KENNEL REGULATIONS USED TO INSPECT COMMERCIAL BREEDING OPERATIONS IN PENNSYLVANIA. WE HAVE TO MAKE CHANGES NOW TO CLEAN UP THESE PUPPY MILLS THAT ARE INHUMANE TO "MAN'S BEST FRIEND".

THESE HELPLESS, ENTIRELY DEPENDENT ANIMALS HAVE GOT TO BE PROTECTED BY US. ANTHING YOU CAN DO WOULD BE GREATLY APPRECIATED.

VERY SINCERELY,



MRS. PAT MCCHESENEY  
556 ANDERSON AVENUE  
PITTSBURGH, PA 15239

CC: ARTHUR COCCODRILLI, CHAIRMAN  
INDEPENDENT REGULATORY REVIEW COMMISSION  
333 MARKET STREET, 14<sup>TH</sup> FLOOR  
HARRISBURG, PA 17101

GOVERNOR ED RENDELL  
REPRESENTATIVE TONY DELUCA  
SENATOR SEAN LOGAN

January 2007

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

Dear Ms. Bender:

A friend of mine, in the Lancaster County area, recently brought to my attention the proposed new and amended kennel regulations. At this time I would like to applaud the Governor, and the Bureau of Dog Law for proposing these new regulations to improve the living conditions of the dogs in commercial breeding kennels. I do not reside in Lancaster County, but understand that it is known as the puppy mill capital of the East coast and that needs to change.

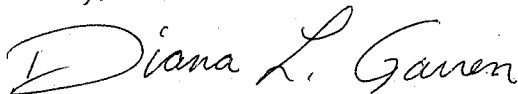
I wanted to inform you and your department that I fully support the proposed kennel regulations and will be looking forward to their passing in the upcoming months!

I feel the amended regulations, such as removing the dogs from their cage before being cleaned, adequate lighting, walking each dog at least 20 minutes per day will reflect the care standards that are needed to insure ethical and humane conditions needed for better overall quality of life for our canine companions.

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" something I am sure your department would like to be known for in future generations.

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

Sincerely,



Diana L. Garren  
312 Jasmine Drive  
Locust Grove, GA 30248

February 5, 2007

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

Dear Ms. Bender:

This letter is regarding the new legislation to improve the living conditions of animals that live in commercial breeding facilities. Thank you so much for your work on behalf of those who have no voice.

I fully support this legislation. I'm constantly thinking of all the suffering dogs that are at these commercial breeding facilities living in cramped cages for years without receiving any attention whatsoever. I'm sure a lot of them are sickly from the food that they are fed and from being caged 24 hours a day.

Please continue to get this legislation passed and that it becomes law. Hopefully the final legislation will not interfere with the work of shelters and rescues who are already working tirelessly on behalf of animals.

Most sincerely,  
Vera Sitze

*Vera Sitze*  
22767 Red Bay Lane  
Milton, DE 19968

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 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:

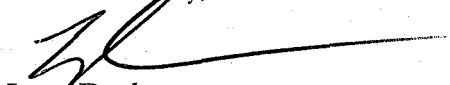
1. Unless the kennel has purchased, sold, or transferred more than 26 dogs in a calendar year to the individual, it is impossible for the kennel to know if the individual is required to have a Pennsylvania kennel license.
2. It is unlawful for the department to regulate and inspect kennels outside of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



Leroy Daub  
1380 Pine Grove Road  
Fredericksburg, PA 17026

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

RECEIVED

2559

2007 FEB 20 AM 11:15

January 26, 2007

INDEPENDENT REGULATORY  
REVIEW COMMISSION

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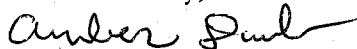
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I sincerely request that this proposal be withdrawn.

Yours Sincerely,



AmberDaub  
1380 Pine Grove Road  
Fredericksburg, PA 17026

2559

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

RECEIVED

2007 FEB 20 AM 11:12

INDEPENDENT REGULATORY  
REVIEW COMMISSION

January 24, 2007

Dear Chairman Coccodrilli,

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

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

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

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

Yours truly,



Planet Pets Plus Quakertown Inc.  
117 South West End Blvd.  
Quakertown, PA 18951

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

January 31, 2007

Dear Ms. Bender,

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

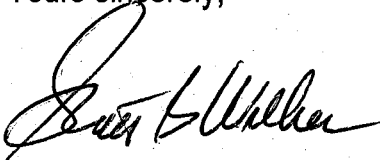
I appreciate that fact that the bureau has helped to improve the dog laws in the past several years. However, the current proposed regulation changes have appeared to be intentionally burdensome and go far beyond mere rulemaking.

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

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

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

Yours sincerely,



The Pet Shop  
Palmer Park Mall  
Easton, PA 18045

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

January 31, 2007

Dear Ms. Bender,

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

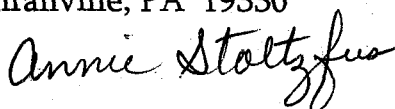
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The Departments direction and intentions are neither attributed as accepted canine husbandry practices nor substantiated by science. The Department should base their changes on education to improve the industry. I request that this proposal be withdrawn.

Yours sincerely,

Annie Stoltzfus  
650 Sawmill Rd  
Cochranville, PA 19330





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

January 31, 2007

Dear Ms. Bender,

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

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 Meadows Pet Resort Kennel  
805 Copenhaffer Rd  
York, PA 17404

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

January 22, 2007

Dear Ms. Bender,

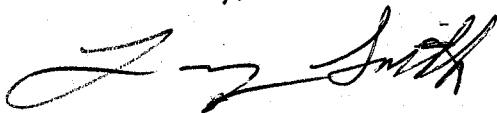
I am writing to express a few concerns that I have with regard to the proposed Dog Law Act 225, which was issued on December 16, 2006.

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

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

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

Yours sincerely,

A handwritten signature in cursive script, appearing to read "Larry Smith".

Larry Smith  
440 Stoney Lane  
Lancaster, PA 17603

Nickelson Gun Dog Kennel  
310 Taylor Road  
Confluence, Pa. 15424-2006

February 5, 2007

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

Dear Ms. Bender,

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


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

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

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

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

Respectfully Submitted,



John Nickelson  
Owner/Manager  
Nickelson Gun Dog Kennel

Linus Martin  
557 S. Fourth Street  
Mifflinburg, PA 17844

January 18, 2007

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

Dear Ms. Bender,

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

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

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

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

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

Yours truly,

*Linus H. Martin*

Linus & Irene Martin  
557 South 4th St  
Mifflinburg, PA 17844

Martin's Kennel  
557 S. 4th St.  
Mifflinburg, PA 17844

January 20, 2007

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

Dear Ms. Bender,

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

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

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

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

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

Yours truly,

*Linus & Irene Martin*

Linus & Irene Martin  
557 South 4th St.  
Mifflinburg, PA 17844

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

January 31, 2007

Dear Ms. Bender,

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

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,

*Meresa M. Kaschak*  
*David J. Kaschak*

T & D Kennels  
3660 Brown Rd  
Waterford, PA 16441

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

January 24, 2007

Dear Ms. Bender,

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

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

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

Yours sincerely,



State College Veterinary Hospital Kennel  
1700 W. College Ave.  
State College, PA 16801

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

January 31, 2007

Dear Ms. Bender,

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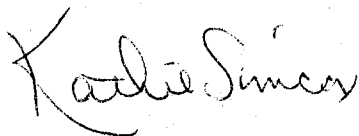
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The Departments direction and intentions are neither attributed as accepted canine husbandry practices nor substantiated by science. The Department should base their changes on education to improve the industry. I request that this proposal be withdrawn.

Yours sincerely,



The Dog House  
2188 Stevenson H. Rd.  
Reynoldsville, PA 15851



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

January 30, 2007

Dear Ms. Bender,

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

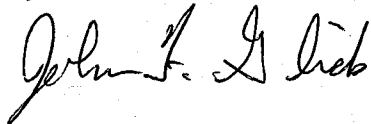
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The Departments direction and intentions are neither attributed as accepted canine husbandry practices nor substantiated by science. The Department should base their changes on education to improve the industry. I request that this proposal be withdrawn.

Yours sincerely,



Townsedge Kennel  
85 Archery Road  
New Providence, PA 17560

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

January 31, 2007

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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,



Samuel K. Stoltzfus  
262 Mascot Road  
Ronks, PA 17572

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

January 31, 2007

Dear Ms. Bender,

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

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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 Dog Gallery  
213 N. Main St  
Davidsville, PA 15928

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

January 30, 2007

Dear Ms. Bender,

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

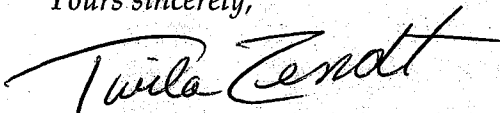
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The Departments direction and intentions are neither attributed as accepted canine husbandry practices nor substantiated by science. The Department should base their changes on education to improve the industry. I request that this proposal be withdrawn.

Yours sincerely,



TJ's Kennel  
271 Winter Park Rd  
Grampian, PA 16838

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

January 31, 2007

Dear Ms. Bender,

I am writing 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:

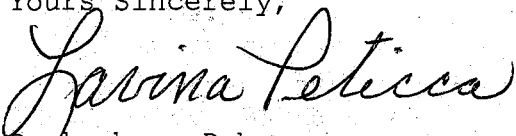
1. Unless the kennel has purchased, sold, or transferred more than 26 dogs in a calendar year to the individual, it is impossible for the kennel to know if the individual is required to have a Pennsylvania kennel license.
2. It is unlawful for the department to regulate and inspect kennels outside of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



Drakenberg Dobermans  
292 Willard Dr.  
Ridley Park, PA 19078

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

January 27, 2007

Dear Ms. Bender,

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

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

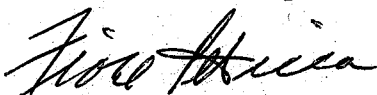
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I sincerely request that this proposal be withdrawn.

Yours Sincerely,



Drakenberg Dobermans  
292 Willard Dr.  
Ridley Park, PA 19078

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

January 30, 2007

Dear Ms. Bender,

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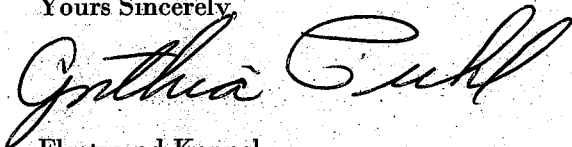
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The current proposal claims to be a general list of ideas to improve the breeding environment for dogs, which are neither substantiated by science nor attributed as accepted canine husbandry practices. A better idea would be for Pennsylvania to adopt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

Yours Sincerely,



Fleetwood Kennel  
117 Reservoir Rd  
Ringtown, PA 17967

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

January 26, 2007

Dear Ms. Bender,

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

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

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

I sincerely request that this proposal be withdrawn.

Yours Sincerely,



Deep Run Kennel  
960 Stracks Dam Rd  
Lebanon, PA 17046



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

January 30, 2007

Dear Ms. Bender,

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

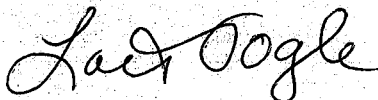
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The current proposal claims to be a general list of ideas to improve the breeding environment for dogs, which are neither substantiated by science nor attributed as accepted canine husbandry practices. A better idea would be for Pennsylvania to adopt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

Yours Sincerely,



Fogle's Dog Training & Boarding  
865 Mark Hanna Rd  
Ashville, PA 16613

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

January 30, 2007

Dear Ms. Bender,

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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,

*Raymond Fisher, owner*

Fisher's Kennel  
45 Fisher Acres Lane  
Pine Grove, PA 17963

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

January 22, 2007

Dear Ms. Bender,

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

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

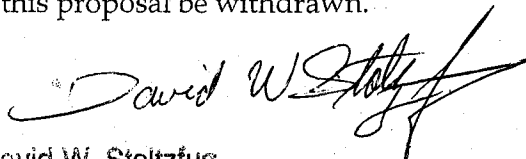
1. Unless the kennel has purchased, sold, or transferred more than 26 dogs in a calendar year to the individual, it is impossible for the kennel to know if the individual is required to have a Pennsylvania kennel license.
2. It is unlawful for the department to regulate and inspect kennels outside of Pennsylvania.
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The current proposal claims to be a general list of ideas to improve the breeding environment for dogs, which are neither substantiated by science nor attributed as accepted canine husbandry practices. A better idea would be for Pennsylvania to adopt USDA type standards.

I sincerely request that this proposal be withdrawn.

Yours Sincerely,



David W. Stoltzfus  
84 Williams Run Road  
Christiana, PA 17509

David W. Stoltzfus  
84 Williams Run Road  
Christiana, PA 17509

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

January 20, 2007

Dear Ms. Bender,

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

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

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

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

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

I sincerely request that this proposal be withdrawn.

Yours Sincerely,



Cave Ridge Kennel  
3409 Brumbaugh Rd.  
New Enterprise, PA 16665

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

January 30, 2007

Dear Ms. Bender,

I am writing 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,

 Res.

TLC Kennel Inc.  
338 Sunnyburn Rd  
Elizabethtown, PA 17022

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

January 30, 2007

Dear Ms. Bender,

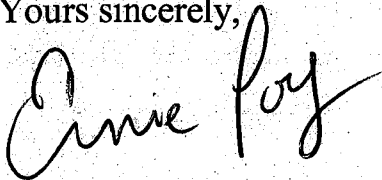
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The Departments direction and intentions are neither attributed as accepted canine husbandry practices nor substantiated by science. The Department should base their changes on education to improve the industry. I request that this proposal be withdrawn.

Yours sincerely,

A handwritten signature in cursive script that reads "Annie Poy". The signature is written in dark ink and is positioned below the "Yours sincerely," text.

Sun Mei Kennels  
4175 Wood Dr  
Walnutport, PA 18088

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

January 26, 2007

Dear Ms. Bender,

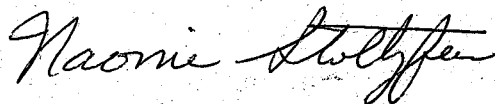
I am writing to express a few concerns that I have with regard to the proposed Dog Law Act 225, which was issued on December 16, 2006.

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

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

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

Yours sincerely,



Naomi Stoltzfus  
5381 Amish Road  
Gap, PA 17527

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

Dear Ms. Bender:

My name is Stephen Brandt and I am a tax consultant living in New Bloomfield, PA. While I have never bred a dog, I am the proud owner of two Brittanies. I am a sporting dog enthusiast and dog lover in general.

I am writing to comment on the proposed amendments to the Pennsylvania dog law regulations issued on December 16, 2006. I believe that inhumane and substandard kennel conditions should not be tolerated, but I do not agree that most of the proposed regulatory changes are needed, or would necessarily have a beneficial outcome if adopted. Many are impractical, excessively burdensome and costly, unenforceable, and/or will not improve the quality of life for the dogs in these kennels.


Examples of problems with the proposal are the following:

- \* The definition of "temporary housing" would require thousands of small residential hobby and show breeding households to become licensed which could not possibly comply with the regulations, and which there is no reason to regulate.
- \* The obligations of owners of "temporary housing" which are made subject to inspection by the proposal are not enumerated or limited.
- \* The regulations will require wholesale renovation, if not rebuilding, of many kennels already built in compliance with current federal and/or state standards. There is no scientific foundation for the arbitrary, rigid engineering standards specified.
- \* Smaller breeders and dog owners who maintain their dogs in their own residential premises but are covered by the Pennsylvania dog law, who provide care and conditions far superior to those required by the proposed new standards, would be unable to comply with the rigid commercial kennel standards.
- \* The record keeping requirements with respect to exercise, cleaning, and other aspects of kennel management are excessively burdensome and serve no useful purpose, as it would be impossible to verify their accuracy in all but the most egregious circumstances. Such egregious circumstances already violate existing regulations.

The above is far from a complete list of the deficiencies with the proposed regulations. I also associate myself with the more detailed comments on this proposal by the Pennsylvania Federation of Dog Clubs.

The Bureau has tacitly conceded that its current regulations have not been adequately enforced. If, after implementing its recently announced enhanced enforcement program, the Bureau finds it is still unable to prevent inhumane treatment of dogs because of specific deficiencies in the existing regulations, it should cite these specific deficiencies and propose changes based on them. The current proposal appears to be merely a laundry list of ideas for improving the environment for dogs that has no connection to specific instances in which the welfare of dogs could not be secured and no basis in science or accepted canine husbandry practices. I urge that this proposal be withdrawn.

Sincerely,



Stephen E. Brandt  
166 Pine Grove Road  
New Bloomfield, PA 17068



**Judy's Pretty Pets  
168 Farmhouse Ln.  
Carrolltown, PA 15722**

January 20, 2007

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

Dear Ms. Bender,

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

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

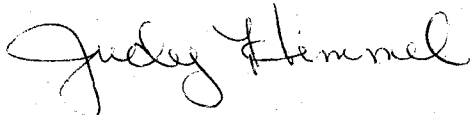
The bureau already requires the name, address, acquisition date, disposition date, type of sale, breed, sex, color, whelping date, and identification number be recorded for each and every dog sold, transferred, adopted, or given away. If the department wishes to enforce the law, they already have all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

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

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

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

Yours Sincerely,



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

January 31, 2007

Dear Ms. Bender,

I am writing 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.

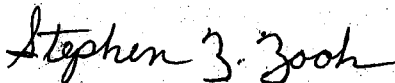
The proposals referencing housing and social interaction of dogs of different sizes are contrary to good husbandry, socializing and training practices. Furthermore, there is no scientific or accepted husbandry basis for the amended space and exercise requirements.

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,



Stephen Z. Zook  
934 Stively Road  
Strasburg, PA 17579

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

January 31, 2007

Dear Ms. Bender,

I am writing 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.

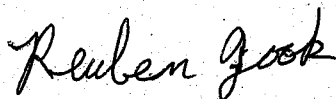
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The current proposed appears to be over idealistic in term of improving the welfare of dogs. I urge that this proposal be rescinded and an approach similar to the USDA standards be developed.

Yours sincerely,



Reuben . Zook  
34 Oak Bend Rd.  
Newburg, PA 17240

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

January 31, 2007

Dear Ms. Bender,

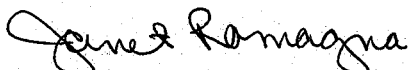
I am writing to comment on the proposed amendments to the Dog Law Regulations Act 225 issued on December 16, 2006. I personally think that many of the changes are impractical and burdensome, and will not improve the quality of life for dogs in kennels.

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

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

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

Yours truly,



Rocksteady Kennels & Pet Supplies  
441 Sportsman Rd  
Saltsburg, PA 15681

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

January 31, 2007

Dear Ms. Bender,

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

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

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

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

I sincerely urge that this proposal be rescinded.

Yours Sincerely,

*Elton Horning*

Elton Horning  
17867 Rt. 104  
Middleburg, PA 17842

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

January 26, 2007

Dear Ms. Bender,

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

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

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

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

Yours truly,



Rom-Ger-Ram Rottweilers  
3614 Rt 982  
Latrobe, PA 15650

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

January 31, 2007

Dear Ms. Bender,

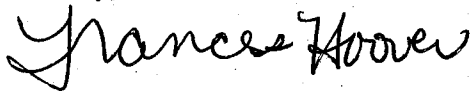
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The current proposed appears to be over idealistic in term of improving the welfare of dogs. I urge that this proposal be rescinded and an approach similar to the USDA standards be developed.

Yours truly,



Rocky-Knob Hill Kennel  
261 Clouse Lane  
East Earl, PA 17519

Bureau of Dog Law Enforcement  
Pennsylvania Department of Agriculture

Attn: Ms. Mary Bender  
2301 North Cameron Street  
Harrisburg, PA 17110-9408

February 5, 2007

Dear Ms. Bender,

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

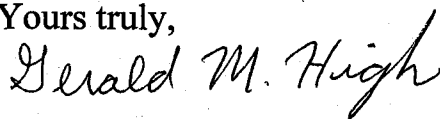
The proposed regulations will require a substantial increase in manpower with many hours dedicated to filling out bureaucratic reports or recordkeeping which the department already has.

Kennels have been custom built to comply with Pennsylvania Department of Agriculture's Dog Law Enforcement standards that were based on USDA Standards. The proposed changes of this section will require the demolition of Pennsylvania's licensed and inspected kennels and the rebuilding of entirely new dimensioned kennels. There is not scientific basis for the change; the average cost per kennel will be between \$30,000.00 and \$500,000.00 each.

With all the additional manpower needed in recordkeeping and the cost of rebuilding the kennels, the cost of puppies will need to double or triple. Then the joy of owning a puppy will be out of reach for many of Pennsylvania's residents unless they buy the puppy from an out-of-state kennel. Additionally, Pennsylvania will lose a considerable amount of tax dollars generated by puppy sales.

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

Yours truly,



Shade Mountain Kennels  
150 Planing Mill Rd.  
Richfield, PA 17086



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

January 31, 2007

Dear Ms. Bender,

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

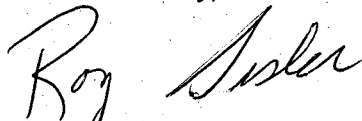
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*The proposed changes make no sense for all kennel owners' dogs to be seized by the Dog Law Bureau based on the Governor's proposed new requirements for pen sized or quarantine regulations. Dog Law places the same dog into a humane society not required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

*I sincerely urge that this proposal be rescinded.*

Yours Sincerely,



Hunting Hills  
181 Hunting Hills Rd  
Dilliner, PA 15327

**Lin David Kennel**  
**86 Church St. Extension**  
**Smithfield, PA 15478**

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

January 31, 2007

Dear Ms. Bender,

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

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

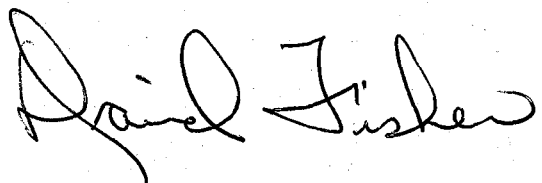
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Unless the kennel has purchased, sold, or transferred more than 26 dogs in a calendar year to the individual, it is impossible for the kennel to know if the individual is required to have a Pennsylvania kennel license.

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

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

Yours Sincerely,

  
Owner

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

January 23, 2007

Dear Ms. Bender,

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

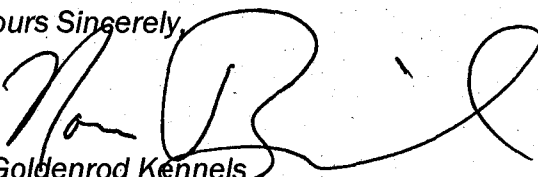
The proposed changes would require the kennel owner to record every time a water bowl or food pan is washed, every time the primary and secondary pen enclosures are cleaned, the feeding and watering dates and times, etc. These excessive and burdensome requirements will require a substantial increase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

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

I sincerely urge that this proposal be rescinded.

Yours Sincerely,



Goldenrod Kennels  
103 White Cloud Rd  
Apollo, PA 15613

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

January 31, 2007

Dear Ms. Bender,

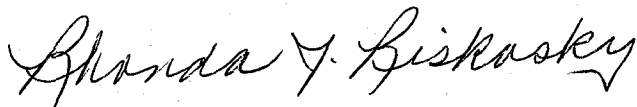
I am writing to comment on the proposed amendments to the Dog Law Regulations Act 225 issued on December 16, 2006. I personally think that many of the changes are impractical and burdensome, and will not improve the quality of life for dogs in kennels.

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

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

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

Yours truly,



Riskosky's Boarding Kennel  
2140 William Flynn Highway  
Butler, PA 16001

**M. M. E. Kennel**  
**1551 Weaverland Road**  
**East Earl, PA 17519**

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

January 31, 2007

Dear Ms. Bender,

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

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

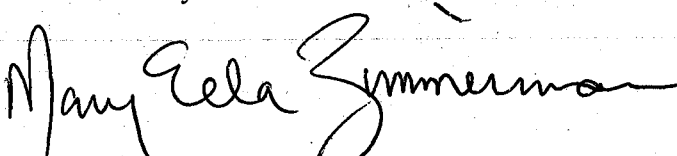
The bureau already requires the name, address, acquisition date, disposition date, type of sale, breed, sex, color, whelping date, and identification number be recorded for each and every dog sold, transferred, adopted, or given away. If the department wishes to enforce the law, they already have all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

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

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

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

Yours Sincerely,

  
Maryella Zimmerman

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

January 31, 2007

Dear Ms. Bender,

I am writing 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.

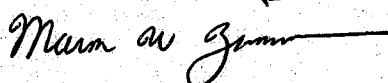
The proposals referencing housing and social interaction of dogs of different sizes are contrary to good husbandry, socializing and training practices. Furthermore, there is no scientific or accepted husbandry basis for the amended space and exercise requirements.

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,



Marvin Zimmerman  
1551 Weaverland Road  
East Earl, PA 17519

Amos L. Martin  
557 S. 4th St.  
Mifflinburg, PA 17844

January 30, 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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The proposed regulations call for kennels to be specific in regard to exercise and cleaning records. These would require a substantial increase in manpower and time dedicated to filling out written bureaucratic reports, and it would be impossible to verify their accuracy. This change would also divert the small business owner's time away from caring for their animals.

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

Yours Sincerely,

*Linus & Irene Martin*  
*Martin's Kennel*

Linus & Irene Martin  
557 South 4th St.  
Mifflinburg, PA 17844

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

January 23, 2007

Dear Ms. Bender,

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

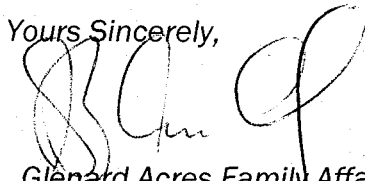
The proposed changes would require the kennel owner to record every time a water bowl or food pan is washed, every time the primary and secondary pen enclosures are cleaned, the feeding and watering dates and times, etc. These excessive and burdensome requirements will require a substantial increase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

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

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

I sincerely urge that this proposal be rescinded.

Yours Sincerely,



Glenard Acres Family Affair Kennel  
Lake Roay Rd Box 197AC  
New Milford, PA 18834



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

January 31, 2007

Dear Ms. Bender,

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

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

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

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

Yours truly, *Amos E. Blank*

Rocky Ridge Kennel  
254 Mascot Rd  
Ronks, PA 17572

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

January 31, 2007

Dear Ms. Bender,

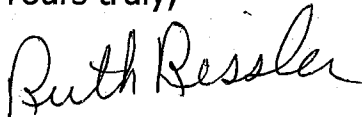
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The current proposed appears to be over idealistic in term of improving the welfare of dogs. I urge that this proposal be rescinded and an approach similar to the USDA standards be developed.

Yours truly,



Ruth Rissler  
2409 Brumbaugh Road  
New Enterprise, PA 16664

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

January 24, 2007

Dear Ms. Bender,

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

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.

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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,

  
Whispering Pines Kennel  
651 W. Weaverland Rd  
New Holland, PA 17557

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

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.

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

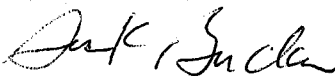
more difficult and creates sanitation problems. Even with a tray or partition between cages, it is likely that the partitions may overflow, causing feces, urine, food, water, and hair to fall onto the dogs located in the cages below.

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,



Sandra K. Buckus  
6872 Lakeway Street  
Ypsilanti, MI 48197  
(734) 547-0410

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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Sincerely,  
Barton and Suzanne Grimm  
30555 Vernon Dr.  
Beverly Hills, MI

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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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,



Liz Tormes  
84 E 4th St # 2  
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 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.

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.

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Sincerely,



Heather Arthur

12142 Aldenham Blvd  
Fishers, IN 46037