

RHODE'S END FARM

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

2559

Dear Ms. Bender:

Although I am not a resident of Pennsylvania, I was born and raised there, am a dog owner, and have visited often, so I am writing to oppose the proposed new regulations for enforcement of the current Dog Law, i.e. 7 PA Code CHS. 21 23 25 and 27. These regulations are so rife with new requirements that have no basis in science or sound animal husbandry that they should be scrapped. There is no evidence presented that the existing regulations, if adequately enforced, would not stop the inhumane practices of "puppy mills".

Just one example of the absurd nature of these regulations is the requirement for such large dog houses, which is contrary to good care, because a dog house needs to be small enough that the body heat of the dog can warm the space when ambient temperatures are low. No manufacturer of dog houses produces one to meet the recommended specifications, except for the smallest dogs in the larger houses.

The costs to the licensed kennels and to the Commonwealth of these proposed regulations is much higher than stated. One, many new state employees will be needed to implement these regulations, not only for enforcement, but just to read the ridiculous amount of paper work stipulated. Two, no mention is made of the impact these regulations will have on dog shows, field trials, and other dog events that occur in Pennsylvania. Three, most of the licensed kennels that I have heard comments from state the costs of retrofitting their kennels would easily exceed \$20,000. Four, no mention is made of the political costs. When the millions of dog owners realize what their government has done to them, there will be consequences.

Space doesn't allow a full critique of these proposed regulations and I am sure you will receive input on that from other sources, but if their intent was to put most of the licensed kennels out of business in Pennsylvania, then they will achieve their aim. No reasonable person wants dogs to be treated inhumanely and abusive "Puppy Mills" should be put out of business or their practices corrected. I would contend the existing regulations can take care of that problem and that these proposed regulations are an embarrassment to the Commonwealth.

Sincerely yours,

Solon Rhode

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INDEPENDENT REGULATORY
REVIEW COMMISSION

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