Arthur Coccodrilli c/o IRRC 333 Market St. Harrisburg, PA 17101

RECEIVED 2007 FEB 21 AM 10: 09 NDEPENDENT REGULATORY REVIEW COMMISSION

Dear Mr. Coccodrilli:

I am writing about the proposed Dog Law changes (ID# 2-152 #2559). I have been a breeder and owner of a "large volume kennel" for many years. We are AKC inspected and licensed by Dog Law but because we do not wholesale, and we deal directly with our many customers we are not licensed federally.

There are many reasons that we see problems with being FDA inspected just like there many reasons that the current proposed changes would hurt our business after 43 years of being open in Pennsylvania at the same location.

We have always prided ourselves on raising happy healthy puppies. We have imported some of Europe's finest bloodlines and champion studs over the years. Our breeding females are put out on a one litter back contract as a puppy and that allows us to sell home raised, socialized puppies. We found out 40+ years ago that this was the only to get the kind of temperament check needed on the pups and the mothers.

But houses do not meet the governors requirements and how many families with one pet want to have their home open for inspection? This policy, allowing us to have home raised puppies, would have to be stopped under the new law and a sterile, barren whelping facility built. We prefer our pups be used to kids, backyards, radios, and the family life they are bred to enjoy. 90% of our pups are family members first, then police dogs, handicap dogs, drug detection dogs, competitors in the show ring or protection for some one famous.

See there is the problem. The SPCAs and Animal Right Activists scream that commercial kennels are "puppymills" and tell the public that all breeders breed sick, dying dogs and have no concern for anyone or anything but money. They say wire bottomed pens are evil. Spaying and neutering are the healthiest thing for every dog.. But let's see.

We were Ft. Dodge's test kennel and because we sacrificed our pups for the future good of all, we now have a parvo vaccine that saves millions of dogs every year from a hideous death. Our pups have three parvo, two distemper, a kennel cough shot, wormings and life time guarantees when they leave our kennel. We are open to the public seven days a week and no appointments are necessary. We have nothing to hide and our pups love visitors.

As to wire bottomed pens, although we have none let me ask you why do the vets use them? Because they keep the animal out of it's feces and from being contaminated by it's littermate who may be shedding coccidia or a virus from it's last booster shot. Wire bottomed exercise pens are also used by show dog breeders to grow coat and not have the coat stained by concrete. We use large paddocks of shredded paper to keep our pups clean because on a flat surface with several puppies in the pens, no one could keep it clean enough that the pups would not get it on themselves. Think about it and then put a row of pens, full of pups in the equation. Is this feasible to do without either the thick coated wire currently required by the regulations or an absorbent bedding? Our experience would say it is not feasible as would anyone who actually does hands on care with animals.

As to neutering, the growing consensus is that it is unhealthy. I will supply articles on the effects that early menopause has on animals but some in brief are 50% increase in bone cancer, 70% more ACL tears in dogs neutered before growth plates close at 18 months, incontinence and increased aggression in females spayed too young. These are just a few of the negatives that neutering can have on dogs. Surprised? Yes, it is true that a dog with testicles will have more testicular cancer than a dog whose testicles were cut off but is that the statistic to base everything on?

The proposed changes are all unnecessary and will close many taxpaying kennels and most hobby breeders for no reason other than certain groups looking down on breeders and pet stores. Please vote down the changes and enforce the current laws.

Sincerely,

Neda Yarnall

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