

February 23, 2007

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

2559

RECEIVED
2007 FEB 28 AM 9:27
INDEPENDENT REGULATORY
REVIEW COMMISSION

ATT: Ms. Mary Bender

Dear Ms. Bender:

For almost 40 years, my wife and I have been involved with Siberian Huskies, breeding, raising and showing the breed and then, after that, supporting the efforts of the Delaware Valley Siberian Husky Rescue organization. In order to continue in our hobby, we obtained and maintained one of the first kennel licenses in a residential zoned area of Lower Moreland Township.

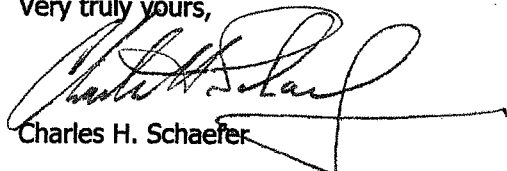
Our breed with its substantial coat prefers living outside. Therefore, we also have always enjoyed the companionship of two dogs inside. We had a Great Dane and a Miniature Pinscher; and we allowed them to run together in our yard (on grass and weeds, no less!), which would be prohibited under the proposed regulations. When we kenneled our Doberman Pinscher and Shiba Inu during the times we were away, we asked that they be in the same run, again questionable under your new rules. This proposal suggests one encompassing rule, which rarely satisfies all situations.

These are common situations encountered by those of us who love and live with our family pets. It is unfortunate that the new proposals have been drafted by more impersonal people who are clearly not in touch with the time and devotion invested by those involved with breeding and showing, and then rescuing the unwanted and abandoned dogs of our communities.

Later this year we shall be moving into a retirement community where residents may continue to have their canine companions. There will undoubtedly be more than 26 dogs there. Will this then require that the community obtain a kennel license and enforce the stringent, detailed requirements upon all of its human and canine residents? The definition of "Establishment" in your proposal might unintentionally encompass it. I doubt that this is the intent of the proposals; but it is not exempted. While the current administration may not intend these consequences, how are we protected from a future, more aggressive administration deciding to interpret the rules and regulations in a more different and more literal way?

I submit that this entire proposal should be given a more careful and detailed evaluation by a group separated from those who have written this one without consultation with the Pennsylvania dog community. Meanwhile, the current law is adequate for most situations, particularly if it is conscientiously enforced, for which you have recently been supplied with additional support. After such enforcement, more than anecdotal information would be available for evaluation of specific deficiencies in the existing law.

Very truly yours,



Charles H. Schaefer

cc: PA Fed of Dog Clubs
IRRC (att: John Jewett)
Sen. Stewart J. Greenleaf
Rep. Thomas Murt