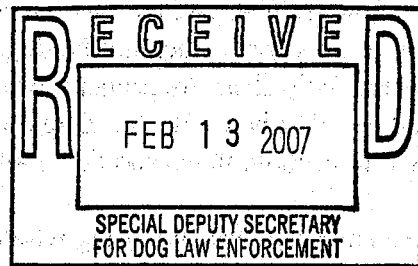


Ringer's Pet Dog Training
405 E 6th Ave.
Tarentum, PA 15084

2559



Bureau of Dog Law Enforcement
Attn: Jessie Smith
PA Dept. of Agriculture
2301 North Cameron St.
Harrisburg, PA 17110-9408

RECEIVED

FEB 26 REC'D

INDEPENDENT REGULATORY
REVIEW COMMISSION

RE: Purposed amendments to the PA Dog regulations issued on Dec. 16th
Exercise criteria; exercise flooring and size of enclosure

Dear Ms Smith

I think it is great that the puppy mill problem in this state is trying to be addressed. The purposed changes will have a negative impact on responsible businesses in PA than the puppy mills.

I run a small doggy daycare, boarding and training facility. The new exercise rules will basically close my daycare. We currently have 15 to 20 dogs a day that range in size. I don't have enough clients in my rural daycare to exercise by size. All the dogs are currently exercised from 9 A.M to 5 P.M. in a large room all together. We have a chihuahua that loves a german shepherd. A pug that play tug with a great dane. The great dane lets the pug win!

We supervise the daycare dogs constantly. Dogs are only accepted into the play group if their temperament is stable. Overly shy or aggressive dogs are not accepted. Separating by size is not a guarantee that a dog is not going to be mauled by other dogs. Small dogs can do damage to each other too.

Puppy mill and boarding kennel workers should never attempt ANY playgroups by size or otherwise. It takes training to read dogs' body language to prevent fights before they start. Playgroups should constantly be supervised.

Doggie daycares are safer than dog parks for exercising dogs. Daycares have the same dog groups each week. They are not overly stressed like dogs in boarding kennels. Daycare dogs are all familiar with each other and can play in groups based on temperament not size. Daycares are supervised and aggressive dogs are not accepted. Any temperament of dog can show up at a boarding kennel or dog park. They shouldn't be exercised together just because they are the same size.

Doggy daycares should have dogs bouncing and playing together all day. Concrete or stones are not the best surface for the dogs' body structure. The dogs are running and jumping all day. Some type of shock absorber or padding should be allowed in daycares. The surfaces should be decided based on the activity level of the dogs.

For their safety, daycare dogs are in temporary holding enclosures until all the dogs arrive for the day. These temporary enclosures are the same size crates used in their homes. Part of daycare training is dealing with dogs with separation anxiety. These dogs have to learn to be in a crate in their home. The temporary enclosure is the appropriate size to allow the dog to sit, turn around and lay down. These crates are sold at every pet store, and are in most homes across the country, they should be allowed as temporary holding enclosures. They are used less than two hours a day. The state could mandate the maximum time the dogs are allowed to be in them, but still let be used in daycare and training facilities.

Daycare and training facilities should be allowed to have furniture within the dogs' indoor area. Part of training or daycare is teaching the dogs not to pee on the carpet or furniture. Carpeting and furniture can be disinfected daily also. As trainers, we try to teach house manners so the dog can remain inside the house and not tied to a dog box outside. Dogs tied outside often become a nuisance with barking and territorial guarding. So some household items should be allowed in training facilities and daycares.

We also have cage free boarding where the same daycare dogs can sleep in the room, without a cage. I sleep on a couch in the same room so they are always monitored. The pet owners today want their animals to be treated like children. As a daycare and boarding facility, we try to keep their environment much like their homes.

We have been operating our daycare for many years. The only problem we had with contagious disease was kennel cough that came from a dog's visit to a vet's office and papiloma virus (puppy warts) that came from a Petland puppy that was from a puppy mill.

Breeding kennels, boarding kennels, training facilities and daycares should have separate standards. They have separate purposes and the dogs are at the facilities for different lengths of time. Yes, some items might overlap, but the current changes will not impact puppy mills as much as the boarding kennels and daycares.

Bruce Ringer
Certified Pet Dog Trainer
405 E 6th Ave.
Tarentum, PA 15084

P.S. Many Boarding Kennels Do not know ABOUT these changes. Why were we NOT notified with our license Renewal?