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March 6 2007  
 Arthur Coccodrilli, Chairman  
 Independent regulatory Review Commission  
 333 Market St, 14 Th Floor  
 Harrisburg, Pa 17101

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 INDEPENDENT REGULATORY  
 REVIEW COMMISSION

Dear Mr. Coccodrilli,

In reviewing the new proposed dog regulations I find many statements that I question; some of these are as follows:

- 1: It is stated that there will be no impact on the general public by adopting these regulations, despite the fact that a large investment will have to be made by each kennel in modifications of facilities and maintenance of meaningless redundant paperwork and procedures. When a business is hit with a large expense it either goes out of business or passes the cost to the consumer; which either way has a negative impact on the general public.
- 2: If my facilities fail to comply with these new standards my dogs may be taken and placed in a facility that will never comply because they are exempt. These regulations would place too much of a burden on them, but this burden is supposed to be acceptable to all other citizens of Pa that have 25 or more dogs in their lives each year.
- 3: The air is supposed to be turned over by ventilation six times per hour and a min. temperature of 50 F is to be maintained. When it is 10 or 20 degrees outside what type of heating system could possibly achieve this goal?
- 4: The dogs' environment is to be maintained at 50-85 degrees, and yet we are required to put them out for 20 min a day when the temperatures could be as varied as much as 0-100 degrees. Making a Pekinese walk in 90-100 degree heat for 20 minutes would kill them. The airlines won't fly any snub nose breed in temperatures above 75 F.
- 5: A permanent cover has to be placed in each pen, but the rest of the pen will still expose the dogs to rain and snow during these 20 min of mandatory exercise. It should be ok to just stay inside in a nice warm environment when the weather outside is miserable.
- 6: I am supposed to visually supervise the play of my dogs during these 20 minute exercise periods. If I'm in the yard all day how can I be cleaning, doing all this paperwork, or even take time to be audited by the state?
- 7: After each group of dogs play in a pen I am to sanitize and then wash the stones. How can this be done when the temperatures are below freezing?
- 8: 5 inches of coarse stone and 3 inches of fine stones are to be maintained, how is this possible? I currently have 1-3 inches of fine stones that routinely have to be redistributed and replaced. The constant segregation of specific layers is impossible.
- 9: Inside and outside areas are to be well ventilated but without drafts, how is this possible?
- 10: Any dog brought to your facility has to be isolated for 14 days. In the case of breeding this would mean you would always miss the female because the ideal time of breeding is 12 days after menstruation begins.

11: Dogs showing aggression must be isolated. Again in the case of a female to be bred she is nasty to the male most of the time so breeding again would be impossible.

12: I got the impression that micro chipping is to be required. This is unnecessary and would be very costly to most breeders.

13: The cost of \$5000 - \$20,000 is severely understated if these proposed regulations would pass. I estimate \$25,000 to \$50,000 as a more realistic estimate.

In my opinion whoever wrote these new regulations knows little or nothing about raising dogs or they know a great deal and that is the intent to write regulations that make it impossible for any kennel to operate in the state of Pa. Please help us keep our right to raise healthy, happy dogs in the state of Pa by voting against these new regulations.

Respectfully,



Derek Gibson

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