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**Bender, Mary**

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**From:** Kathy Fuller [luvchihuahuas@comcast.net]  
**Sent:** Thursday, March 08, 2007 4:46 PM  
**To:** Mary Bender  
**Subject:** Pennsylvania Proposed Changes to Kennel Regulations

Kathy Fuller  
241 Prospect Ave  
Morrisville, PA 19067-1133

March 8, 2007

Mary Bender  
Bureau of Dog Law Enforcement  
Pennsylvania Department of Agriculture  
2301 North Cameron Street  
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INDEPENDENT REGULATORY  
REVIEW COMMISSION

Dear Mary Bender:

I am writing this with great concern for small breeders/show people of pure bred dogs! This proposal is wrong so wrong, why should "we" follow the regulations when our dogs are cared for even better than proposed.

As a dog breeder, I am one hundred percent behind laws and regulations that promote the welfare of dogs. I believe that all dogs deserve the best of care, and that kennels should be managed with that goal in mind. However, I have some serious concerns about the proposed regulations.

Actual dog breeders were not able to give input into these proposed regulations, but animal rights oriented individuals were invited to provide input. This means those with actual experience were unable to contribute valuable information into the decision making process.

It doesn't make sense to apply commercial facility standards to those who keep dogs in their homes and raise puppies there. It is very likely that requiring commercial standards for home breeders will lower the quality of handling for home-raised dogs.

The new requirements for the space and exercise for dogs are not based on accepted husbandry standards or scientific research.

Small home-based breeders would be unable to comply with standards set for commercial kennels even though they currently provide excellent care within the home.

Requiring the keeping of records regarding the exercise of the dogs, the cleaning of their runs, and other aspects of kennel management will not improve the health and welfare of the dogs. Also, it would not be possible to verify that these records were accurate or meaningful.

For many Pennsylvania dog breeders, the regulations would require the rebuilding or renovation of kennels which already comply with current federal and state regulations. Establishing rigid engineering standards for kennels does not contribute to the health and welfare of the dogs.

There is no pressing reason to regulate the thousands of small hobby and show breeders by requiring them to become licensed and to comply with regulations more appropriate for large commercial kennels. These small breeders are providing quality puppies and dogs for the public which are well socialized in a family setting.

Most small breeders with dogs in their homes are not covered by present Pennsylvania dog law. These people provide care and management of their dogs that is far superior to the care required by the new proposals. If these regulations were put in place, these small breeders would not be able to meet the rigid requirements for commercial kennels.

Most home based dog breeders provide more space and better care than that required by the regulations under the Animal Welfare Act. Home breeders do not keep dogs in small cages.

Failure to require reasonable cage space in humane society kennels doesn't make sense. Dogs housed at shelters and humane societies also deserve reasonable cage space.

How is the twenty minute a day exercise requirement for dogs housed in kennels going to be monitored and certified? This is a requirement that cannot be verified by oversight authorities.

Regulations to keep dogs off grass do not make sense. Most home-based and small breeders put their dogs outdoors into a fenced yard for exercise and play. Keeping dogs off grass would prohibit these people from allowing their dogs into the yard. Common sense dictates that such a requirement will not improve dog welfare.

These proposed regulations are going to have a very negative effect on the many small rescues who may have over 26 dogs on the premises at one time. Requiring these small rescues to meet commercial kennel standards would result in many being unable to continue as rescues.

Requiring male and female dogs to be exercised separately unless both are neutered does not make sense. If the male animal is neutered, certainly the female animal cannot be impregnated! Or vice versa, if the female animal is spayed, the male animal cannot impregnate her.

Small hobby breeders do a good job of screening future owners, so that their dogs are more likely to stay in their new home. In the event that becomes impossible for various reasons, these small hobby breeders often take back their animals and re-home them successfully.

Dog breed clubs contribute to the education of the public with regard to proper care and handling of dogs and provide information about the different breeds of dogs so that new owners can make a more informed choice. Breed clubs also provide dog training classes open to the public.

Responsible hobby breeders are raising wonderful healthy puppies and dogs which go to homes where they become loved family members. These responsible hobby breeders would be negatively impacted by the proposed regulations. They would have to change the way they presently keep, breed and raise their animals. Keeping their animals in their homes allows the animals to be well socialized into a family situation and allows the puppies to transition much more easily into their new homes. Eliminating these small hobby breeders would do a disservice to the people of Pennsylvania who want a good family dog.

Please see that these proposed regulations are re-visited with the purpose of amending the unreasonable requirements and thereby improve the health and welfare of dogs in Pennsylvania.

Please add stakeholders to all future Dog Advisory Boards.

Sincerely,

Kathy Fuller