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**Subject:** sent to Ms. Bender at Dept of Ag. Harrisburg Pa.  
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An Associated Press news story in Pennsylvania's TimesLeader.com reported:

The Agriculture Department estimates that kennels that do not meet the proposed regulatory standards would have to spend anywhere from \$5,000 to \$20,000 to renovate their facilities, said Jessie Smith, the agency's special deputy secretary for dog law enforcement.

<http://www.timesleader.com/mld/timesleader/16846524.htm>

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 INDEPENDENT REGULATORY BOARD OF PENNSYLVANIA

This number is bogus.....as it will depend on the kennel size and land requirements, set backs etc..Some kennels can NOT be enlarged and house the same number of boarding runs because of set back and right of ways and the amount of land they have. If you have a sixty run kennel with the new regulations, you then would have a 30 run kennel with your current building under the new rules. Unless you could double the size of the building and put up twice as much chain link and concrete block runs your business is cut in half.

What happens if two dogs from the same house come to a boarding kennel with this new set of regulations.....and both dogs usually sleep and play together at home (live together). You now would need four runs for the two dogs to be "together" instead of two dogs in one run and maybe one dog in the three others. Again, you've not cut the business to 25% of the income it needs to exist or the boarding of a dog or cat will cost as much or more then a good hotel in the area. How many will be able to remain in business and better question, who the heck will be able to afford boarding a dog or cat as you go on a vacation or have to attend a family funeral for two examples?

An example of what would likely happen to a twenty run kennel that has to make the runs twice as large inside and out is that they will have to build a bigger building in addition to larger chain link runs etc. Maybe you can't build bigger....if you have to build a new building to accommodate the larger kennel runs....and build to code and to the dog law and it's requirements. \$50,000 may not be even half....as you have to demolish the old and buy the new, pay to have it constructed and suffer the lost time of no business as the "improvements" are made.

The new size has no "Science" attached to it....somebody's "feel good size" is what this size requirement looks like. Therefore should not be considered at all. No Science, No Documented Need should equal No "Law" or "Rule".

The people being put on to the Dog Law department are not people of animal care background nor is it part of the need / requirement in their job qualifications, as I understand it. They seem to be hiring ex cops and ex military police (this from a source on the independent panel) to

enforce LAW, rather than look at the animals and apply common sense to what they inspect and pass judgement on.

The documents that are to be filled out are six forms if I understand this correctly. If I had 50 dogs in a boarding kennel that would be 300 forms per day to fill out.... With 20 dogs in a training situation that would take more then half the day to just fill out the forms for all dogs in training.....and no training would get done.

Kennel Licenses come in the form of Private or Business --- a private kennel should be just that...and inspected as a private kennel.....NOT as a large volume breeding kennel.

Training kennels are not boarding kennels and as I understand it, if I work the dogs out in the fields hunting/training, the time they are worked is not considered their "formal exercise" / "socialization" time. This does not make sense. Working these dogs every day would also create sore, stiff dogs with muscle that breaks down rather then builds up.

People that bring dogs or cats to boarding kennels may NOT WANT their dogs or cats out of the cages....with the risk of fights or disease spread by community contact with other animals / dogs / cats. Forced exercise may not be good for some older pets that have a sedentary life at home....forced exercise at the kennel may actually endanger the animals life. In addition some animals are never allowed outside as part of their home experience. How or why should they and the owners and the kennel have to deal with this animal outside, if the animal is forced to go outside. What about inclement weather? Do you force the animals outside and the kennel people in the rain or snow or ice...?? Are we supposed to have large indoor arenas to exercise the dogs in as well as outside exercise areas.....are they to be covered. The cost would be a terrible burden on the owners of the kennel.

Putting numbers (number of puppies) on what it is that makes you a retail business or a animal related business or a hobby is not a good measure of what is a puppy mill or large volume breeder. The licence should tell you if it is a business where the people running the kennel make their livelihood, If it is their main source of income, then they are in business. If you want to say if they SELL TO PET STORES/ or WHOLESAL DEALERS of dogs or cats, THEY ARE A LARGE VOLUME BREEDER BUSINESS, THAT IS FINE ALSO WITH ME. Private breeders for the most part that are concerned, quality breeders, are not selling to the pet stores or the wholesale dealers that re-sell to pet stores.

Requiring concrete exercise areas for the forced exercise is not good as well as it can damage a dog's pads if the dog or cat is not used to concrete. Although the possibility of better sanitation is possible, it is also possible that it can harbor problems as well for dogs and people. (Can be more slippery on wet days....or snow days. It can also hold more heat on hot days in the summer.)

Regulate the puppy mills as an ANIMAL BREEDING business and maybe not as a kennel !!!

Leave the hobby breeder, the boarding kennel, the show and training kennels to their business and recognize that they have specific needs for their animals that are different. They not the Breeding Business that the state is trying to "fix". Recognize they are dependent on good clean facilities to draw clients and good dogs and a public record of good work to get new clients and keep the old ones. Those that don't do a good job will regulate themselves out of business as

pet owners won't bring their loved pets to them.

The LARGE VOLUME BREEDER that sells to pet shops and dog dealers that sell to pet shops are not dependent on a retail cliental to keep in business. The public almost never see's where this "puppy mill" puppy has lived or was raised for the first 8 to 9 weeks. All they ( LARGE VOLUME BREEDERS) need are puppies in large numbers and thus you can have problems not related to the hobby breeder, show kennel, training kennel or even the boarding kennels that may raise one, two or three or maybe four or five litters in one year.....might not raise another litter for two or three or more years also.

The new rules need to be tempered with some common sense and the puppy mill business that the Governor is worried about, along with the dog and cat owning communities, first needs to have a DEFINED Criteria as to what is a PUPPY MILL. After that is done....look at the license structure we have in Pa. Look at how puppies are registered and see if there is a way to have only registered dogs sold in pet shops...let the Rescues and Animal Shelters sell the mixed breeds, stray recoveries, and dogs that are not part of a house that are taken and thus not in competition with pet stores selling some of these dogs. Get the Large Breeding Kennels set up and defined as Breeding Kennels / Large Volume if you want .....and let them be inspected as BREEDING KENNELS.... not as Boarding Kennels, NOT as a private citizen's kennel, or a hunting dog kennel, or a Dog Show or Cat Show Kennel.

The new rules will cost the business community some money, the State of Pa. money in courts with unclear, poorly thought out rules that lack clear definition. Since both groups can write off business expense the only people you will hurt with the new rules will be the private community that owns the pets and wants either a Pure Bred dog from an expert breeder of that dogs breed, or a place to take their dogs to be either boarded or trained or if they like to compete with their pet, the show and competition training kennel for show dogs and hunting dogs. The Puppy Mill group will spend the money and the average person that has a few dogs won't be able to keep or raise any dogs in their homes where the expertise, love, affection, and knowledge of the breed are a key part of the home raised litters

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