4308 Mannsville Rd Newport, Pa. 17074

March 09, 2007

Dear Ms. Bender,

I am writing in response to the proposed changes to the Pa. Dog Law. I have taken a long time to read them over and to offer alternative suggestions. It is obvious that these changes were written without thought as to practical and correct dog rearing or the impact on hobby breeders/owners with a K1 license.

I am a K1 kennel. I am a hobby breeder who shows in AKC conformation and J performance events. I have 13 permanent dogs and 8 others that I co-own and who live 90% of the time with their co-owners. Sometimes they are here for showing, training or breeding. I also have two males at stud and I breed 2 litters a year. I offer extensive health guarantees on the dogs I raise and the parents of puppies all have complete health clearances and DNA profiles. At any point that an owner of one of my dogs can't keep it, the dog comes back to be re-homed. If an owner has a training problem. I take the dog here and work with it and the owner. My dogs do not end up in shelters! I have bred over 115 AKC champions and 200 performance titled dogs. The Pa. State police used one of my dogs as a drug detection dog and several are working as handicap assistance dogs. Most are well loved pets and hunting companions. I have worked with several vet schools on health research to develop genetic testing for health problems. The point I want to make is that due to my activities in AKC events, maintaining a careful and healthy breeding line and the responsibility I take in follow up help and training, I reach the 26 K1 dog license threshold. I am a law abiding citizen so because I reach the 26 K1 license requirement, I buy a license. My dogs have 4 or 6 X 10 runs that either has insulated weather resistant dog houses with cover or they go into a heated and cooled building. They run nearly every day in the woods and fields on my property and play in my pond and stream. Puppies are born in the house and handled from birth, play in the kitchen, have pens outside for play with shade. I take them on "learning" walks in a variety of footing and sound exposures. I am the kind of person you should WANT to buy a dog from. Where is room in your regulations for a quality dog rearer like me?! I am not alone either. There are many small scale hobby breeders/owners like myself. The proposed regulations on record keeping, kennel heating/cooling, lighting, construction are cost prohibitive for me to afford. I don't make money with the dogs; I raise them because I love them.

Did who ever wrote these regulations realize how many hobby owners/breeders fall so easily into the K1 category? Press releases claim these rules are not for the hobby breeder/owner but they will apply to them. Claim is made that the proposals on puppy rearing will not apply to hobby breeders who raise pups in their homes. Again, if someone is being a good citizen, many hobby breeders do fall under the proposed puppy raising regulations. Even more though, these rules on raising puppies go against good dog rearing practices.

Puppies need to be raised in a home setting. Read enclosure marked A. The sterile and antiseptic, factory-like puppy raising requirements in your proposals are in direct conflict with good dog husbandry! They are promoting an environment that only a large business-like kennel and breeding operation could afford. Is this your intention?! One of the biggest problems with puppy mills is that they don't raise their litters properly- in the home with human contact. If anything, your rules should be promoting the home raising of puppies with human contact and not preventing it! Believe me; people who are raising multiple litters at one time could not meet a requirement for home rearing and human contact. If you want to keep big puppy farms in operation, then enact these requirements for rearing pups. Is this your intention? If it is, at least raise the K1 license necessity number from 26 to 51 so small hobby breeders/owners like me can give Pa. citizens the access to properly raised puppies. However, the proposed regulations should

be dropped entirely as they are not in the best interest of the dogs themselves and promote a business like operation.

I do not like to see dogs raised in large multiple breed kennels where they never touch the ground or have access to sunlight and daily human contact. If the intention is to truly improve conditions for dogs in Pa. then go about it right.

1) Start enforcing the rules you currently have. Train your kennel inspectors to recognize humane and proper dog husbandry. Work with AKC as different breeds can have different housing needs. Trust your people to be able to recognize good dog rearing practices and those situations that are NOT conducive to the health and welfare of the dogs. Give them the authority to do something when they find situations that need to shut down or have changes made and back them up.

2) The current law forbids the use of barrels or barrel like structures for dog housing. Look at enclosure B. This type of pen should also be outlawed as a housing option. No dog should spend its entire life in one of these wire pens with their feet never touching the ground! Temporary pens for puppies with coated wire are fine for good hygiene but only up to 12 weeks or so.

3) Requiring concrete, stone or gravel for footing as a base for kennel runs or enclosures is fine. But also, require the enclosures or runs to the give the dog free access to natural light. Dog housing should be either runs that go into a kennel building or be weather resistant insulated dog houses that have a roof that can keep snow and rain off the dog house itself. Drop the exercise provision and the record keeping for it. It is unenforceable to start with. Besides the state does not mandate exercise for its school children but it wants to for dogs? What is wrong with this picture! Most dogs in runs will exercise themselves anyway. Drop the requirements on specific drain sizes, lighting, heating & cooling or apply to large multiple breed operations only (again provided you raise the K1 license requirement to 51). Give your inspectors the job of looking at each kennel and deciding if the housing is suitable for the breed. Listen to them. Are the runs/enclosures clean; do the dogs appear healthy, comfortable and happy; do they look well fed and groomed; are runs/enclosures free from standing water and dry so they provide good footing and foot health; do stand alone dog houses have cover from rain/snow. Again, trust them to look at things. Different dog breeds have different needs. You are making things too complicated-use common sense and be flexible. The best way to be sure dogs are being cared for properly is the knowledgeable human inspector, not realms of words. Sterile, businesslike structures (which the proposals promote) are NOT what you want to be encouraging.

Don't be misled by the many animal rights group who are supporting the regulations as currently written. These groups are not for the dogs-their agenda is to make things so no one can have the pleasure of the companionship of a well bred and properly raised dog. The dogs in the shelters are not coming from people like me either. They are coming from the general public who buy from puppy farms and turn around and breed their pets. Then in turn don't care who they sell to. It all starts with the multiple breed puppy farms that don't care what happens to and with the dogs they sell. AKC, Pa Dog Federation, the many kennel clubs throughout Pa; they are the resources that you should be using in developing regulations that will work and have the best in mind for the dogs. They **REALLY** care about the dogs.

Sincerely,

Dyone Balolwin

Enclosure A

BREED COLUMNS

SPOTLIGHT: BASENJIS

Highlighting a breed column of general interest each month

Puppy Success and Development Periods

Guest columnist Suzanne La Croix is a cognitive ethologist researching the ontogeny of behavior in canids at Michigan State University. She has bred and competed with Basenjis since 1994.

Have you ever wondered why certain breeders consistently turn out dogs that have "popping" performances in the conformation, coursing, obedience, agility, or home venues? Our focus on genetics can sometimes overshadow the important impact that breeders can have during critical periods of puppy development that supplements the animals' genetic health and conformation and shapes their future ring behavior.

Successful breeders socialize puppies in an early, consistent, and targeted way that lays a solid foundation for future development. By applying an understanding of critical periods in development (first described by researcher John Paul Scott in 1962), the young breeder, new trainer, and novice owner can shape puppy success, too.

Neonate Period (0-3 weeks): Hold and pet every puppy every day. Human touch is qualitatively different then

tively different than the bitch's touch; these interactions may predispose the puppy to human handling.

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Transition Period (3-4 weeks): Build positive associations with all things human. Introduce background noises (human voices, nail grinders); background scents (shampoo, dinner cooking); and background visual stimuli (grooming table, children, or other pets moving through the area). Please, no silent kennels or back bedrooms!

Socialization Period (3-12 weeks): Set a foundation for specific adult behaviors. Introduce stacking, dumbbells, solid agility obstacles like the tunnel, show-ring fencing, stuffed bunnies for chasing, and household furniture. Allow puppies to observe adult dogs exhibiting desired behavior and performing commanded tasks.

Puppies should receive safe, positive, and repeated (at least once per week) exposure to preschool children, older children, adults (male and female), and senior adults. Introduce them to a crate and different ground surfaces. Basic leash work, time on a grooming table, and short car rides also improve future aptitude.

Most importantly, during this stage (especially 4–8 weeks), puppies develop the ability to bond to humans. If you've ever wondered why some dogs will work for you and others won't, the seeds were probably sown during this critical period of development. Each puppy must receive daily human interaction with emphasis on physical contact.

Fear Period (8-10 weeks): Just when socializing is proceeding with great success, puppies may suddenly exhibit fear and avoidance of familiar stimuli. When a puppy exhibits sudden shyness, immediately return it to the safe litter environment. This stage usually lasts only a day or two.

Juvenile Period (12 weeks-puberty): As puppies arrive in their new homes, the stage is set for bonding with their new human family and confidently expanding their skills. From the start, the new owner should teach "who's the boss" by consistently asking for and reinforcing desired behaviors. Introduce generalized commands and activities specific to your performance interests; expect more precision as the animal matures. New owners should provide ongoing positive experiences with new people, places, sights, and sounds.

Adulthood: Recommendations for socialization and training typically end with the juvenile period.

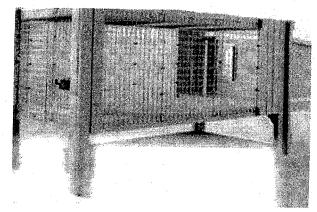
However, it is the subsequent years of consistent training through which a dog acquires lifelong skills and performance abilities. Handlers should continue reinforcement of the dog's early positive socialization experiences. Having received targeted formative experiences, he is sure to be a

natural-and a star for years to come! -S.L.C. Thanks, Suzanne. -Marcia A. Woodard, 17009 76th Ave. W., Edmonds, WA 98026; Marcia@barkless.com +

FEBRUARY 2007 47

Enclosure B

Page 1 of 1



This is for rabbite, not dage!