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The Kennel Club of Philadelphia
4968 Durham Road, Box 399
Pipersville, PA 118947

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INDEPENDENT REGULATORY
REVIEW COMMISSION

March 12, 2007

Bureau of Dog Law Enforcement
Pennsylvania Department of Agriculture
2301 North Cameron Street
Harrisburg, PA 17110-9408

ATT: Ms. Mary Bender

Dear Ms. Bender:

We are very concerned with the proposed revisions to the Dog Law Rules and Regulations that have been promulgated by the Pennsylvania Department of Agriculture. It contains many stringent requirements regarding the details of the housing for dogs maintained in a licensed kennel.

However, the first item of concern to us is the new term "establishment" contained on page 2 of the provisions. It inserts this as part of the definition of those requiring a kennel license, stating: *The premises...shall include all of the...property, hosing facilities or any combination thereof, on, in or through which any dog is kept,..harbored,..sheltered.*

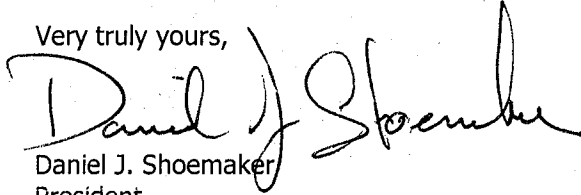
The Kennel Club of Philadelphia and its predecessors have been holding dog shows annually for over 100 years. In fact, The American Kennel Club was organized in Philadelphia in 1884. We host one of only six "benched" dogs shows held in the United States, where all of the dogs entered must remain on their assigned bench during a specific period of the show. This year our shows are scheduled at the Pennsylvania Convention Center on November 17 and 18, with unbenched shows on the preceding two days hosted by Greater Philadelphia Dog Fanciers and Penn Treaty Kennel Club. Our show will again be filmed and shown on national television on Thanksgiving Day to the largest television audience for dog shows (over 18 million viewers in 2006).

One of the attractions to the dog owners and handlers is that we allow them to keep their dogs on their benches overnight (we provide security), allowing them the opportunity to enjoy the pleasures of the City of Philadelphia in the evening. Because of the ambiguity of the wording of the proposed revision, we might be required to obtain a kennel license; and if that is the case, most of the travel crates used by dog show exhibitors would not meet the new detailed standards required by the regulations. These exhibitors will probably skip Philadelphia rather than purchase bulky, ineffective crates not even acceptable to the airlines.

Further, those owners and handlers who would rather keep their dog with them overnight and who have traveled a distance, will stay in a local hotel or motel with their pet. Since over the year those facilities would probably have over 25 dogs visit in the course of a year, they would also require a kennel license. Again, they would then be required to have the newly specified kennels for dogs. Effectively, those hotels/motels throughout the entire state that offer to allow dogs in their rooms would probably elect to prohibit dogs, eliminating visits to their community.

Both of the above scenarios will result in an adverse financial impact upon the City of Philadelphia. We ask that you review this new proposal. While this letter specifically addresses the issue of kennel licenses for dog shows and the host hotels/motels, we are just as concerned with the requirements of breeding, boarding and rescue kennels. They would have a long-term impact on our hobby of breeding, raising and showing purebred dogs. As such, they will be addressed by the Pennsylvania Federation of Dog Clubs, of which our club is a member. If you would like more details, please contact us.

Very truly yours,

A handwritten signature in cursive script that reads "Daniel J. Shoemaker". The signature is written in black ink and is positioned above the printed name and title.

Daniel J. Shoemaker
President

Cc: **all Philadelphia State Senators and Representatives**
Pennsylvania Federation of Dog Clubs