

**Bender, Mary**

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**From:** William Burkland [wsburkland@hotmail.com]  
**Sent:** Tuesday, March 13, 2007 10:06 AM  
**To:** Mary Bender  
**Subject:** Pennsylvania Proposed Changes to Kennel Regulations

William Burkland  
P. O. Box #467  
Ligonier, PA 15658-0467

March 13, 2007

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

Dear Mary Bender:

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.

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

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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.

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.

Requiring burdensome record keeping by dog breeders will not improve the health and welfare of the dogs, but will add time consuming activities to kennel owners and dog breeders.

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.

Separating dogs out by size alone during exercise makes no sense. Size is only one consideration. There should be a reasonable approach to exercise, based on several criteria, which might include behavior and history of the individual animals, as well as other aspects.

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.

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.

Sincerely,

William S. Burkland

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