

RECEIVED  
March 13, 2007

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

INDEPENDENT REGULATORY  
REVIEW COMMISSION

**RE: Regulation ID # 2-152 (#2559)  
Dog Law Regulations**

Dear Ms. Bender:

I submit the following comments on the Proposed Amendments to the Pennsylvania Dog Law Regulations at Title 7 of the Pennsylvania Code.

#### Section 21.14 Kennel Licensure Provisions

(a)(3)(ii) This section would group kennels, commercial breeders, rescue organizations, and foster homes together and subject them to the same requirements.

This provision is unreasonable as it applies to foster homes that are utilized by all volunteer rescue organizations. Dogs that are placed in foster care are kept in a home environment just like owned dogs. The foster dogs are the "temporary" pets kept by a household until the animal finds its permanent home. These animals are not crated or kept in kennel-like conditions. Instead, the animals are kept inside, in a home environment. It is unreasonable to hold a home situation to the same standards as a commercial kennel or breeding facility. Foster homes utilized by rescues provide more humane living conditions for the animals cared for by rescues, because the animals are indoors, socialized, and become housebroken. It would not be in the best interest of the animals to require the foster homes to place animals in a kennel environment instead allowing them to live inside a home.

The purpose of these revised regulations was supposed to be to better regulate living conditions for the animals raised in puppy mills and other breeding facilities. Extending the regulation to include all volunteer non-kennel based rescues and foster homes does nothing to regulate the puppy millers. Instead, the proposed regulations impose standards upon private, all volunteer rescues that they would be unable to afford to meet, forcing them to close down, thereby jeopardizing the lives of the tens of thousands of animals assisted by rescues each year.

For example, assume there are 100 foster home-based rescues in Pennsylvania, each handling 1,000 animals per year. If rescues were to close, that is 100,000 animals that would be placed into the system for municipalities and shelters to handle in an already overburdened system. The cost to taxpayers would increase due to municipalities having to handle animals previously assisted by rescues. Shelters would be more overburdened

that they already are, forcing them to kill the overflow of animals—animals whose lives would have been spared in the rescue system.

Rescues serve an important function. They help animals with no cost to the taxpayers, and aid the state-wide economy by giving veterinarians tremendous business, and well as the pet stores for food and supplies. Thus, putting the rescues out of business--as the regulations would do--would have a far reaching impact on taxpayers and the state-wide economy. Thus, foster based rescues should be exempt from the provisions of these proposed regulations, and there should be an explicit provision stating that in the proposed regulations.

In addition to the exemption for rescues, the proposed regulations should put a clear limit on the number of puppies that can be produced each year by the commercial breeders, and strict fines imposed if they do not comply. The proposed regulations do nothing to stop the endless production of animals by the commercial breeders. Allowing this production to continue will sanction the killing of animals by shelters all across the Commonwealth.

Respectfully submitted,

*Sandi Meary*

cc: Arthur Coccodrilli, Chairman  
Independent Regulatory Review Commission  
333 Market Street, 14<sup>th</sup> Floor  
Harrisburg, PA 17101

Governor Edward G. Rendell  
225 Main Capitol Building  
Harrisburg, PA 17120

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

February 13, 2007

RE: Comments on proposed Dog Law regulations

Dear Ms. Bender,

I respectfully submit this comment on the proposed changes to the Dog Law regulations.

First, I would like to commend the Department of Agriculture and the Bureau of Dog Law Enforcement for proposing amendments to the Dog Law Regulations to improve conditions for dogs housed and bred in commercial breeding operations in Pennsylvania. **It should also be noted that the proposed changes to the regulations do not bring hobby breeders under the Act. The same people who were exempt from the former regulations (i.e. hobby breeders who raise, breed, move, sell, etc. fewer than 26 dogs per year), will continue to be exempt under the revised regulations.**

Furthermore, I fully support the comments submitted by the American Society for the Prevention of Cruelty to Animals (ASPCA) on behalf of its members, and incorporate them herein by reference. Specifically, I strongly support the following:

1. The penalties in § 21.4(1)(iii) for "failure of an individual to comply with licensure provisions" should be increased from \$25 to \$300 per violation to \$25 to \$300 *per day of violation*.
2. The Secretary should be mandating to file suit to enjoin operation of unlicensed kennels where the kennel is not in compliance with the standards in the regulations and is unable to qualify for a license.
3. I commend the Department of Agriculture and the Bureau of Dog Law Enforcement for doubling the required cage size. This is perhaps the most important change that can be made to improve the quality of life for dogs in commercial breeding facilities in Pennsylvania. This provision should remain in the regulations regardless of opposition from breeders. This section should be further strengthened by adding a provision stating that where more than one dog is housed in a primary enclosure, the primary enclosure must provide adequate space for all dogs. For instance, if the enclosure houses two dogs, it must provide double the cage space that would be required for a single dog. If it houses three dogs, it must provide three times the cage space, etc.
4. I also commend the Department of Agriculture and Bureau of Dog Law Enforcement for including a provision that requires the dog wardens to visually observe the physical condition of each dog. However, the provisions regarding orders of veterinary care

should be strengthened to state that the owner must provide "proof of *current and proper* veterinary care for the dog." This provision should also be amended to include excessive matting and excessively long toenails as indications of lack of proper veterinary care. Inadequate grooming can lead to painful medical issues for dogs, including skin lesions from excessive matting and leg and joint injuries from failure to keep toenails appropriately trimmed. Moreover, the section should be amended to *require* dog wardens to order a veterinary check on dogs that exhibit signs of infection, contagious disease or parasite; or that appear to be in poor health where proof of current and proper veterinary care is not provided.

5. A new subsection should be added to § 21.30 clarifying the required training for dog wardens. Training in the following areas should be added into the regulations to expand upon the requirements set forth in 3 P.S. § 459-901:

1. State laws relating to dog licensing, control and owner responsibilities;
2. State and federal laws relating to animal care, cruelty and neglect;
3. State laws relating to dangerous dogs;
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5. State and federal laws relating to pounds and shelters;
6. Basics of cruelty and neglect investigations for referral to appropriate authorities;
7. Report-writing and record-keeping;
8. Overview of the legal system, court structure and terminology;
9. Basics of interpreting animal behavior;
10. Identification of injury, disease, abuse and neglect in dogs;
11. Animal hoarders; and
12. Civil liability issues.

6. A new section should be added to the regulations mandating that the Department and dog wardens coordinate and work with law enforcement when applicable. It is imperative that the department work with law enforcement, and specifically Humane Society police officers, to ensure that both the cruelty laws and the Dog Law are adequately enforced.

7. A new section should be added to the regulations requiring that a licensee must have enough employees to carry out the level of husbandry practices and care required by the Act and its regulations. Additionally, the employees who provide for care and husbandry or handle animals should be supervised by an individual who has the knowledge, background, and experience in proper husbandry and care of dogs to supervise others. The licensee must be certain that the supervisor and other employees can perform to such standards.

8. Stacking primary enclosures on top of one another should be prohibited. Stacking



cages creates an unnatural environment for the dogs. Additionally, it makes observation of the dogs more difficult and creates sanitation problems. Even with a tray or partition between cages, it is likely that the partitions may overflow, causing feces, urine, food, water, and hair to fall onto the dogs located in the cages below.

9. The section on wire mesh flooring should be amended to make it at least as strict as the federal Animal Welfare Act, which requires that metal strand flooring be greater than one-eighth of an inch in diameter (9 gauge) or coated with a material such as plastic or fiberglass. Language should also be added requiring that all primary enclosures that have wire mesh flooring also have a resting board of sufficient size to allow each dog in the enclosure to lie in a full lateral recumbent position and be able to make normal postural adjustments. Resting boards are necessary to provide for the comfort of the dog and to allow the animal to have some time away from living on grated fencing. Providing resting boards will result in fewer foot lesions and other foot and leg injuries to the dogs. A solid resting surface that is impervious to moisture is also a more natural environment for the animal, provides a draft-free surface and enables the dog to retain its body heat. A dog feels most vulnerable when lying down, and forcing a dog to lie over an exposed area can contribute to anxiety. Humane standards and survival standards are separate, and creating an environment that merely allows for survival does not necessarily make such an environment humane.

10. Contrary to what the breeding industry states, the engineering standards specified in the proposed regulations do have a scientific foundation. The standards in the proposed regulations are more akin to acceptable husbandry practices. They will bring the engineering standards up to par with, if not above, those set forth in the Animal Welfare Act. Contrary to the hobby breeders' contention, the new regulations will not bring hobby breeders under the purview of the Dog Law. Only kennels that keep, harbor, board, shelter, sell, give away, or transfer *a cumulative total of 26 or more dogs* in one calendar year will be required to comply with the new regulations. As a result, true hobby breeders are still exempt from the law. Good husbandry practices dictate that anyone harboring a larger number of dogs (26 or more) should comply with certain engineering standards to ensure the health, safety, and well-being of the dogs. The Dog Law and its regulations are aimed at regulating larger and commercial breeding facilities. Therefore, the new regulations will not affect hobby breeders, contrary to what the breeding community suggests.

Once again, I commend the Department of Agriculture and the Bureau of Dog Law Enforcement for proposing regulations that will improve the conditions for dogs housed and bred in Pennsylvania's commercial kennels. The changes I have noted above will further ensure that such dogs are protected. Thank you for your time and consideration.

Sincerely,



February 11, 2007

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

Dear Ms. Bender:

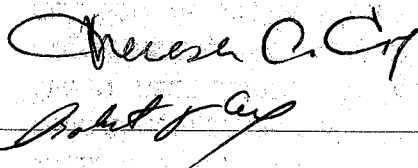
I am writing to you in reference to the new legislation being proposed by lawmakers in PA in an effort to improve the living conditions of animals that live in commercial breeding facilities. I would like to applaud your efforts and thank you for your work on behalf of those who have no voice.

I am writing to enthusiastically support this legislation. It is my hope that legislators will not bend to the special interests of groups who are allowing their collective financial self-interest to supercede the overall welfare of the dogs that live in these commercial breeding facilities. As you are well aware, many of these dogs spend **years** living in cramped cages with little or no medical care, no good nutrition, no socialization and no opportunity for regular exercise. It is unfortunate indeed that some turn a blind eye to the suffering of these helpless animals. I fully realize that these are the facilities that this legislation is intended to regulate more effectively.

Once again, I applaud your efforts on behalf of the helpless animals that are suffering in the state of PA at this very moment due to the greed of certain individuals. I hope that you will work tirelessly to see to it that this legislation can be passed and become law. It is my hope that the final legislation will not interfere with the work of shelters and rescues who are already working tirelessly on behalf of animals. That being said, I would like to once again express my support of this legislation.

Most sincerely,

Theresa Cox



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February 5, 2007

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

Dear Ms. Bender:

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Most sincerely,

*Miss Amanda O'Leary*  
*3056 State Route 119*  
*New Alexandria*  
*Pa*  
*15670*

February 5, 2007

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Department of Agriculture  
Bureau of Dog Law Enforcement  
2301 North Cameron Street  
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Most sincerely,

*Mr. Richard Burkhardt  
Main St.  
Johnstown Pa  
15906*

February 5, 2007

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Department of Agriculture

Bureau of Dog Law Enforcement

2301 North Cameron Street

Harrisburg, PA 17110-9408

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Most sincerely,

*Kathleen Ann Krudjinski*  
*1240 Barnes Rd*  
*Warminster, Pa. 18974*

February 5, 2007

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

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Most sincerely,

Carl Flemming  
Marathon, FL 33050

February 5, 2007

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

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Most sincerely,

*Naomi Minked*



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

February 2, 2007

RE: Comments on proposed Dog Law regulations

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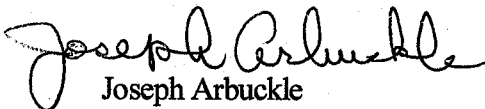
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Sincerely,



Joseph Arbuckle  
619 Olde Farm Road  
Media, PA 19063

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

February 12, 2007

RE: Comments on proposed Dog Law regulations

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10. Contrary to what the breeding industry states, the engineering standards specified in the proposed regulations do have a scientific foundation. The standards in the proposed regulations are more akin to acceptable husbandry practices. They will bring the engineering standards up to par with, if not above, those set forth in the Animal Welfare Act. Contrary to the hobby breeders' contention, the new regulations will not bring hobby breeders under the purview of the Dog Law. Only kennels that keep, harbor, board, shelter, sell, give away, or transfer a cumulative total of 26 or more dogs in one calendar year will be required to comply with the new regulations. As a result, true hobby breeders are still exempt from the law. Good husbandry practices dictate that anyone harboring a larger number of dogs (26 or more) should comply with certain engineering standards to ensure the health, safety, and well-being of the dogs. The Dog Law and its regulations are aimed at regulating larger and commercial breeding facilities. Therefore, the new regulations will not affect hobby breeders, contrary to what the breeding community suggests.

Once again, I commend the Department of Agriculture and the Bureau of Dog Law Enforcement for proposing regulations that will improve the conditions for dogs housed and bred in Pennsylvania's commercial kennels. The changes I have noted above will further ensure that such dogs are protected. Thank you for your time and consideration.

Sincerely,

Gloria Novak  
39 RIVERVIEW AVE.  
Pgh. PA 15214

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

February 12, 2007

RE: Comments on proposed Dog Law regulations

Dear Ms. Bender,

As a concerned citizen of the state of Pennsylvania, I respectfully submit this comment on the proposed changes to the Dog Law regulations.

First, I would like to commend the Department of Agriculture and the Bureau of Dog Law Enforcement for proposing amendments to the Dog Law Regulations to improve conditions for dogs housed and bred in commercial breeding operations in Pennsylvania. **It should also be noted that the proposed changes to the regulations do not bring hobby breeders under the Act. The same people who were exempt from the former regulations (i.e. hobby breeders who raise, breed, move, sell, etc. fewer than 26 dogs per year), will continue to be exempt under the revised regulations.**

Furthermore, I fully support the comments submitted by the American Society for the Prevention of Cruelty to Animals (ASPCA) on behalf of its members, and incorporate them herein by reference. Specifically, I strongly support the following:

1. The penalties in § 21.4(1)(iii) for "failure of an individual to comply with licensure provisions" should be increased from \$25 to \$300 per violation to \$25 to \$300 *per day of violation*.
2. The Secretary should be mandating to file suit to enjoin operation of unlicensed kennels where the kennel is not in compliance with the standards in the regulations and is unable to qualify for a license.
3. I commend the Department of Agriculture and the Bureau of Dog Law Enforcement for doubling the required cage size. This is perhaps the most important change that can be made to improve the quality of life for dogs in commercial breeding facilities in Pennsylvania. This provision should remain in the regulations regardless of opposition from breeders. This section should be further strengthened by adding a provision stating that where more than one dog is housed in a primary enclosure, the primary enclosure must provide adequate space for all dogs. For instance, if the enclosure houses two dogs, it must provide double the cage space that would be required for a single dog. If it houses three dogs, it must provide three times the cage space, etc.



4. I also commend the Department of Agriculture and Bureau of Dog Law Enforcement for including a provision that requires the dog wardens to visually observe the physical condition of each dog. However, the provisions regarding orders of veterinary care should be strengthened to state that the owner must provide "proof of *current and proper* veterinary care for the dog." This provision should also be amended to include excessive matting and excessively long toenails as indications of lack of proper veterinary care. Inadequate grooming can lead to painful medical issues for dogs, including skin lesions from excessive matting and leg and joint injuries from failure to keep toenails appropriately trimmed. Moreover, the section should be amended to *require* dog wardens to order a veterinary check on dogs that exhibit signs of infection, contagious disease or parasite; or that appear to be in poor health where proof of current and proper veterinary care is not provided.

5. A new subsection should be added to § 21.30 clarifying the required training for dog wardens. Training in the following areas should be added into the regulations to expand upon the requirements set forth in 3 P.S. § 459-901:

1. State laws relating to dog licensing, control and owner responsibilities;
2. State and federal laws relating to animal care, cruelty and neglect;
3. State laws relating to dangerous dogs;
4. State and federal law relating to lack of arrest powers, proper use of search, seizure and warrants;
5. State and federal laws relating to pounds and shelters;
6. Basics of cruelty and neglect investigations for referral to appropriate authorities;
7. Report-writing and record-keeping;
8. Overview of the legal system, court structure and terminology;
9. Basics of interpreting animal behavior;
10. Identification of injury, disease, abuse and neglect in dogs;
11. Animal hoarders; and
12. Civil liability issues.

6. A new section should be added to the regulations mandating that the Department and dog wardens coordinate and work with law enforcement when applicable. It is imperative that the department work with law enforcement, and specifically Humane Society police officers, to ensure that both the cruelty laws and the Dog Law are adequately enforced.

7. A new section should be added to the regulations requiring that a licensee must have enough employees to carry out the level of husbandry practices and care required by the Act and its regulations. Additionally, the employees who provide for care and husbandry or handle animals should be supervised by an individual who has the knowledge, background, and experience in proper husbandry and care of dogs to supervise others. The licensee must be certain that the supervisor and other employees can perform to such standards.

8. Stacking primary enclosures on top of one another should be prohibited. Stacking cages creates an unnatural environment for the dogs. Additionally, it makes observation of the dogs more difficult and creates sanitation problems. Even with a tray or partition between cages, it is likely that the partitions may overflow, causing feces, urine, food, water, and hair to fall onto the dogs located in the cages below.

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Once again, I commend the Department of Agriculture and the Bureau of Dog Law Enforcement for proposing regulations that will improve the conditions for dogs housed and bred in Pennsylvania's commercial kennels. The changes I have noted above will further ensure that such dogs are protected. Thank you for your time and consideration.

Sincerely,

Anabell Kinney

Anabell Kinney  
439 Eureka St  
Pgh PA 15211

2559

January 24, 2007

Arthur Coccodrilli, Chairman  
Independent Regulatory Review Commission  
333 Market Street, 14<sup>th</sup> Floor  
Harrisburg, PA 17101

RECEIVED

2007 FEB -9 AM 11: 11

INDEPENDENT REGULATORY  
REVIEW COMMISSION

Dear Chairman Coccodrilli,

As a Pennsylvania breeder, I am strongly opposed to the overly restrictive rules and regulations that are proposed for kennel owners. The enforcement of regulations such as these will effectively serve to shut down or severely curtail the activities of the concerned, caring and law-abiding breeders in Pennsylvania. The extensive number of regulations outlined in this proposal and the limited time allotted prevents the proper consultation and review of these regulations with our kennel veterinarian and other professionals. Therefore, in order to allow for the proper review and consultation of this extensive proposal, I request a ninety-day extension of the comment period.

As a Pennsylvania breeder, my goal and the goal of other law-abiding breeders is to raise the best quality and healthiest puppy possible. This is not the issue. Unfortunately, the issue created by this proposal is my rights as a citizen of this state to own property, and my rights to be afforded due process guaranteed by the provisions of our state's constitution. The vagueness of this proposal causes great concern that my rights as a citizen will be omitted by the bias opinion of those who will hear my side of the story.

As a Pennsylvania breeder, I am concerned that these overly burdensome regulations will have severe unforeseen consequences. These include reduced number of breeders willing to deal with the excessive administrative burden caused by these regulations. The shortages of puppies and resulting higher prices, which will encourage the import of oversea and out of state puppies. The ensuing shortages will provide a lucrative opportunity for those who operate beneath the law to fill these shortages. Those who participate in this black market will find the rewards well worth the risk. Additionally, the economic loss to the state will be in the millions, and will go far beyond the breeder to include pet supply retailers, cities who sponsor shows, and state tax revenue.

As a Pennsylvania breeder, I believe it is unfortunate that this proposal appears to be more about animal activism than about animal welfare. You only have to consider the one section that permits shelters and other similar facilities that provide a "service" to be exempt from these regulations. I immediately question the intent behind those who are pushing the governor on this issue. What sense does it make to remove animals from a substandard facility and place them in another substandard facility? None! Furthermore, this proposal has no incentives or educational programs for the breeders. It is all threats and punishment, which is another indication, that the motives of those supporting this proposal are more interested in eliminating our industry than in improving our industry.

Sincerely,

*Ben Speicher*

2559

January 24, 2007

Arthur Coccodrilli, Chairman  
Independent Regulatory Review Commission  
333 Market Street, 14<sup>th</sup> Floor  
Harrisburg, PA 17101

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2007 FEB -9 AM 11: 11

INDEPENDENT REGULATORY  
REVIEW COMMISSION

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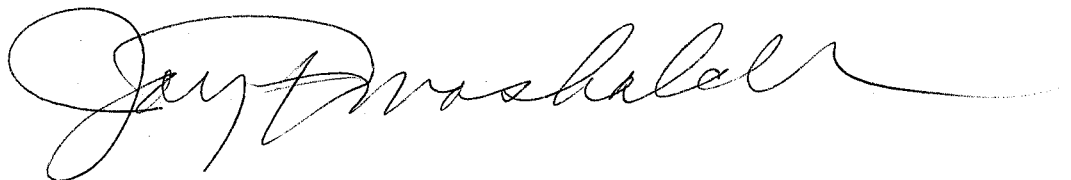
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Sincerely,



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January 24, 2007

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Independent Regulatory Review Commission  
333 Market Street, 14<sup>th</sup> Floor  
Harrisburg, PA 17101

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2007 FEB -9 AM 11:11

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January 24, 2007

Arthur Coccodrilli, Chairman  
Independent Regulatory Review Commission  
333 Market Street, 14<sup>th</sup> Floor  
Harrisburg, PA 17101

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Sincerely,



2559

Irvin + Lydia Ann Zimmerman  
769 Red Run Rd.  
New Holland 17557  
Pa.

January 24, 2007

Arthur Coccodrilli, Chairman  
Independent Regulatory Review Commission  
333 Market Street, 14<sup>th</sup> Floor  
Harrisburg, PA 17101

RECEIVED  
2007 FEB -9 AM 11:17  
INDEPENDENT REGULATORY  
REVIEW COMMISSION

Dear Chairman Coccodrilli,

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Sincerely,

Lydia Ann Zimmerman  
Irvin + Zimmerman



2559

January 24, 2007

Arthur Coccodrilli, Chairman  
Independent Regulatory Review Commission  
333 Market Street, 14<sup>th</sup> Floor  
Harrisburg, PA 17101

RECEIVED

2007 FEB -9 AM 11:11

INDEPENDENT REGULATORY  
REVIEW COMMISSION

Dear Chairman Coccodrilli,

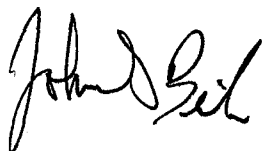
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Sincerely,



January 24, 2007

Arthur Coccodrilli, Chairman  
Independent Regulatory Review Commission  
333 Market Street, 14<sup>th</sup> Floor  
Harrisburg, PA 17101

RECEIVED

2007 FEB -9 AM 11: 10

INDEPENDENT REGULATORY  
REVIEW COMMISSION

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Sincerely,



Mountain View Kennel  
428 Mountain View Drive  
Howard, PA 16841

2559

RECEIVED

2007 FEB -9 AM 11:14

INDEPENDENT REGULATORY  
REVIEW COMMISSION

January 26, 2007

Independent Regulatory Review Commission  
Attn: Arthur Coccodrilli, Chairman  
333 Market Street, 14th Floor  
Harrisburg, PA 17101

Dear Chairman Coccodrilli,

I am writing in response to the proposed amendments to the Dog Law Act 225 which was issued on December 16, 2006.

With a full understanding that the bureau is trying to improve substandard kennel conditions, I am not in agreement that most of the changes are necessary.

The proposed record keeping would require me to write down the date and time I washed each food and water bowl, every time a pen is cleaned; each individual outside run is cleaned, etc. It would be better for me to have my general daily procedures that I routinely follow, in writing. This is similar to how the USDA regulations are worded.

The proposed changes would also require the demolition of Pennsylvania's licensed and inspected kennels. Yet, there is no scientific basis for the change. In addition, the average cost to rebuild kennel will be between \$30,000.00 and \$500,000.00 each.

I sincerely urge that this proposal be withdrawn, as the beneficial outcome will be in question if the proposal is adopted.

Yours truly,

*Mountain View Kennel  
428 Mountain View Dr.  
Howard, Pa. 16841*

January 24, 2007

Arthur Coccodrilli, Chairman  
Independent Regulatory Review Commission  
333 Market Street, 14<sup>th</sup> Floor  
Harrisburg, PA 17101

RECEIVED

2007 FEB -9 AM 11:13

INDEPENDENT REGULATORY  
REVIEW COMMISSION

Dear Chairman Coccodrilli,

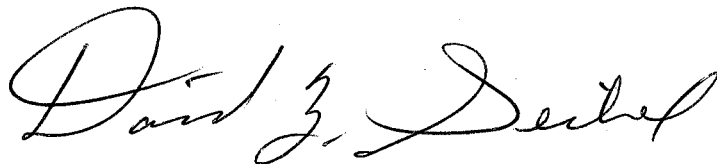
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January 24, 2007

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Independent Regulatory Review Commission  
333 Market Street, 14<sup>th</sup> Floor  
Harrisburg, PA 17101

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REVIEW COMMISSION

Dear Chairman Coccodrilli,

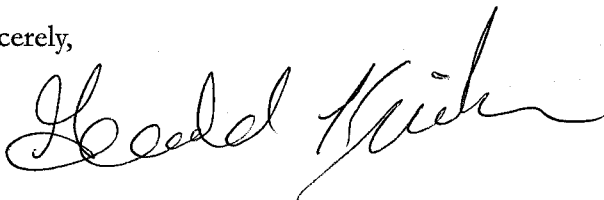
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Sincerely,



2559

January 24, 2007

Arthur Coccodrilli, Chairman  
Independent Regulatory Review Commission  
333 Market Street, 14<sup>th</sup> Floor  
Harrisburg, PA 17101

RECEIVED

2007 FEB -9 AM 11:13

INDEPENDENT REGULATORY  
REVIEW COMMISSION

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Sincerely,

*Allen + Mary Zimmerman*

January 24, 2007

Arthur Coccodrilli, Chairman  
Independent Regulatory Review Commission  
333 Market Street, 14<sup>th</sup> Floor  
Harrisburg, PA 17101

RECEIVED

2007 FEB -9 AM 11:12

INDEPENDENT REGULATORY  
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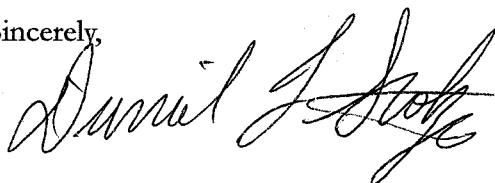
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Sincerely,





2559

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Independent Regulatory Review Commission  
333 Market Street, 14<sup>th</sup> Floor  
Harrisburg, PA 17101

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333 Market Street, 14<sup>th</sup> Floor  
Harrisburg, PA 17101

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Sincerely,

*Jeremy  
Mason*

2559

RECEIVED

January 24, 2007

Arthur Coccodrilli, Chairman  
Independent Regulatory Review Commission  
333 Market Street, 14<sup>th</sup> Floor  
Harrisburg, PA 17101

2007 FEB -9 AM 11:12

INDEPENDENT REGULATORY  
REVIEW COMMISSION

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Sincerely,

*Linus H. Marten*  
*Marten's Kennel*  
*557. SOUTH 4th ST*  
*Mifflinburg PA 17844*

2559

January 24, 2007

Arthur Coccodrilli, Chairman  
Independent Regulatory Review Commission  
333 Market Street, 14<sup>th</sup> Floor  
Harrisburg, PA 17101

RECEIVED

2007 FEB -9 AM 11:11

INDEPENDENT REGULATORY  
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Sincerely,

*Daniel J Peachey and Lydia S Peachey*  
Stone Mountain Kennel  
4220 E. Back Mtn. Road  
Belleville, Pa. 17004

2559

Janet Sensenig  
442 Old Henry Path Rd.  
New Enterprise, Pa. 16663

January 24, 2007

Arthur Coccodrilli, Chairman  
Independent Regulatory Review Commission  
333 Market Street, 14<sup>th</sup> Floor  
Harrisburg, PA 17101

2007 FEB -9 AM 11:14

INDEPENDENT REGULATORY  
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Sincerely,

Janet R. Sensenig

2559

January 24, 2007

Arthur Coccodrilli, Chairman  
Independent Regulatory Review Commission  
333 Market Street, 14<sup>th</sup> Floor  
Harrisburg, PA 17101

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Sincerely,

*John S. Fisher*

2559

Jason Sensenig  
442 Old Henry Path Rd.

New Enterprise, PA. 16664

January 24, 2007

Arthur Coccodrilli, Chairman  
Independent Regulatory Review Commission  
333 Market Street, 14<sup>th</sup> Floor  
Harrisburg, PA 17101

INDEPENDENT REGULATORY  
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2007 FEB -9 AM 11:14

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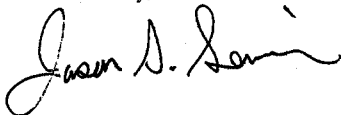
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Sincerely,



DAVID PEACHEY  
3520 E. BACK MOUNTAIN RD  
BELLVILLE, PA 17004

2559

RECEIVED

JANUARY 30, 2007

2007 FEB -9 AM 11:12

INDEPENDENT REGULATORY REVIEW COMMISSION  
ATTN: ARTHUR COCCODRILLI, CHAIRMAN  
333 MARKET STREET, 14TH FLOOR  
HARRISBURG, PA 17101

INDEPENDENT REGULATORY  
REVIEW COMMISSION

DEAR CHAIRMAN COCCODRILLI,

I AM WRITING IN RESPONSE TO THE PROPOSED AMENDMENTS TO THE DOG LAW ACT 225 WHICH WAS ISSUED ON DECEMBER 16, 2006.

WITH A FULL UNDERSTANDING THAT THE BUREAU IS TRYING TO IMPROVE SUBSTANDARD KENNEL CONDITIONS, I AM NOT IN AGREEMENT THAT MOST OF THE CHANGES ARE NECESSARY.

THE PROPOSED RECORD KEEPING WOULD REQUIRE ME TO WRITE DOWN THE DATE AND TIME I WASHED EACH FOOD AND WATER BOWL, EVERY TIME A PEN IS CLEANED; EACH INDIVIDUAL OUTSIDE RUN IS CLEANED, ETC. IT WOULD BE BETTER FOR ME TO HAVE MY GENERAL DAILY PROCEDURES THAT I ROUTINELY FOLLOW, IN WRITING. THIS IS SIMILAR TO HOW THE USDA REGULATIONS ARE WORDED.

THE PROPOSED CHANGES WOULD ALSO REQUIRE THE DEMOLITION OF PENNSYLVANIA'S LICENSED AND INSPECTED KENNELS. YET, THERE IS NO SCIENTIFIC BASIS FOR THE CHANGE. IN ADDITION, THE AVERAGE COST TO REBUILD KENNEL WILL BE BETWEEN \$30,000.00 AND \$500,000.00 EACH.

I SINCERELY URGE THAT THIS PROPOSAL BE WITHDRAWN, AS THE BENEFICIAL OUTCOME WILL BE IN QUESTION IF THE PROPOSAL IS ADOPTED.

YOURS TRULY,

*David R Peachey*  
*3520 E. BK mtn Rd*  
*Bellville PA 17004*



2559

Oak Ridge Kennel  
532 Knapko Rd  
Marion Center, PA 15759

RECEIVED

2007 FEB -9 AM 11:10

INDEPENDENT REGULATORY  
REVIEW COMMISSION

January 30, 2007

Independent Regulatory Review Commission  
Attn: Arthur Coccodrilli, Chairman  
333 Market Street, 14th Floor  
Harrisburg, PA 17101

Dear Chairman Coccodrilli,

I am writing in response to the proposed amendments to the Dog Law Act 225 which was issued on December 16, 2006.

With a full understanding that the bureau is trying to improve substandard kennel conditions, I am not in agreement that most of the changes are necessary.

The proposed record keeping would require me to write down the date and time I washed each food and water bowl, every time a pen is cleaned; each individual outside run is cleaned, etc. It would be better for me to have my general daily procedures that I routinely follow, in writing. This is similar to how the USDA regulations are worded.

The proposed changes would also require the demolition of Pennsylvania's licensed and inspected kennels. Yet, there is no scientific basis for the change. In addition, the average cost to rebuild kennel will be between \$30,000.00 and \$500,000.00 each.

I sincerely urge that this proposal be withdrawn, as the beneficial outcome will be in question if the proposal is adopted.

Yours truly,

Noah Byler

2559

**Lin David Kennel**  
**86 Church St. Extension**  
**Smithfield, PA 15478**

RECEIVED  
2007 FEB -9 AM 11: 11

Independent Regulatory Review Commission  
Attn: Arthur Coccodrilli, Chairman  
333 Market Street, 14<sup>th</sup> Floor  
Harrisburg, PA 17101

INDEPENDENT REGULATORY  
REVIEW COMMISSION

January 31, 2007

Dear Chairman Coccodrilli,

I am writing in response to oppose the Dog Law Regulations Act 225 recently issued on December 16, 2006. The current regulatory proposals in general are unenforceable and extremely onerous when put into practice.

The proposed regulations call for kennels to be specific in regard to exercise and cleaning records. These would require a substantial increase in manpower and time dedicated to filling out written bureaucratic reports, it would be impossible to verify their accuracy. This change would also divert the small business owner's time away from caring for their animals.

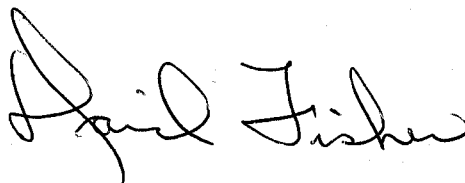
The bureau already requires the name, address, acquisition date, disposition date, type of sale, breed, sex, color, whelping date, and identification number be recorded for each and every dog sold, transferred, adopted, or given away. If the department wishes to enforce the law, they already have all information needed.

Unless the kennel has purchased, sold, or transferred more than 26 dogs in a calendar year to the individual, it is impossible for the kennel to know if the individual is required to have a Pennsylvania kennel license.

Additionally, kennels have been custom built to comply with the Department of Agriculture's Dog Law Enforcement standards that were based on USDA standards. The proposed changes of this section will require the demolition of licensed and inspected kennels and the rebuilding of entirely new dimensioned kennels. The average cost per kennel will be between \$30,000.00 and \$500,000.00 each.

I sincerely urge that this proposal be rescinded and the USDA standard be adopted in Pennsylvania.

Yours Sincerely,

  
Owner

2559

**Martin Lucy**  
**1645 Weaverland Rd**  
**East Earl, PA 17519**

RECEIVED

2007 FEB -9 AM 11: 11

Independent Regulatory Review Commission  
Attn: Arthur Coccodrilli, Chairman  
333 Market Street, 14<sup>th</sup> Floor  
Harrisburg, PA 17101

INDEPENDENT REGULATORY  
REVIEW COMMISSION

January 31, 2007

Dear Chairman Coccodrilli,

I am writing in response to oppose the Dog Law Regulations Act 225 recently issued on December 16, 2006. The current regulatory proposals in general are unenforceable and extremely onerous when put into practice.

The proposed regulations call for kennels to be specific in regard to exercise and cleaning records. These would require a substantial increase in manpower and time dedicated to filling out written bureaucratic reports, it would be impossible to verify their accuracy. This change would also divert the small business owner's time away from caring for their animals.

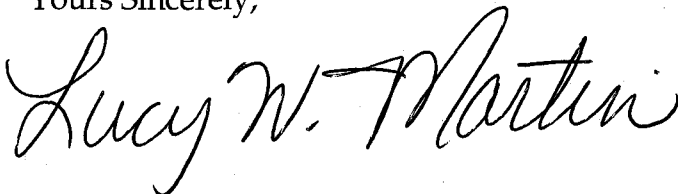
The bureau already requires the name, address, acquisition date, disposition date, type of sale, breed, sex, color, whelping date, and identification number be recorded for each and every dog sold, transferred, adopted, or given away. If the department wishes to enforce the law, they already have all information needed.

Unless the kennel has purchased, sold, or transferred more than 26 dogs in a calendar year to the individual, it is impossible for the kennel to know if the individual is required to have a Pennsylvania kennel license.

Additionally, kennels have been custom built to comply with the Department of Agriculture's Dog Law Enforcement standards that were based on USDA standards. The proposed changes of this section will require the demolition of licensed and inspected kennels and the rebuilding of entirely new dimensioned kennels. The average cost per kennel will be between \$30,000.00 and \$500,000.00 each.

I sincerely urge that this proposal be rescinded and the USDA standard be adopted in Pennsylvania.

Yours Sincerely,



2559

**Little Bit Farm**  
**2413 Trewigtown Rd**  
**Colmar, PA 18915**

RECEIVED  
2007 FEB -9 AM 11:11

Independent Regulatory Review Commission  
Attn: Arthur Coccodrilli, Chairman  
333 Market Street, 14<sup>th</sup> Floor  
Harrisburg, PA 17101

INDEPENDENT REGULATORY  
REVIEW COMMISSION

January 31, 2007

Dear Chairman Coccodrilli,

I am writing in response to oppose the Dog Law Regulations Act 225 recently issued on December 16, 2006. The current regulatory proposals in general are unenforceable and extremely onerous when put into practice.

The proposed regulations call for kennels to be specific in regard to exercise and cleaning records. These would require a substantial increase in manpower and time dedicated to filling out written bureaucratic reports, it would be impossible to verify their accuracy. This change would also divert the small business owner's time away from caring for their animals.

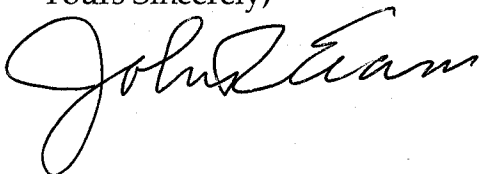
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Unless the kennel has purchased, sold, or transferred more than 26 dogs in a calendar year to the individual, it is impossible for the kennel to know if the individual is required to have a Pennsylvania kennel license.

Additionally, kennels have been custom built to comply with the Department of Agriculture's Dog Law Enforcement standards that were based on USDA standards. The proposed changes of this section will require the demolition of licensed and inspected kennels and the rebuilding of entirely new dimensioned kennels. The average cost per kennel will be between \$30,000.00 and \$500,000.00 each.

I sincerely urge that this proposal be rescinded and the USDA standard be adopted in Pennsylvania.

Yours Sincerely,



2559

Independent Regulatory Review Commission  
Attn: Arthur Coccodrilli, Chairman  
333 Market Street, 14<sup>th</sup> Floor  
Harrisburg, PA 17101

RECEIVED

2007 FEB -9 AM 11:12

January 19, 2007

INDEPENDENT REGULATORY  
REVIEW COMMISSION

Dear Chairman Coccodrilli,

I am writing to comment on the proposed amendments to the Dog Law Regulations Act 225 issued on December 16, 2006. I personally think that many of the changes are impractical and burdensome, and will not improve the quality of life for dogs in kennels.

The proposed regulations will require a substantial increase in manpower with many hours dedicated to filling out bureaucratic reports or recordkeeping which the department already has.

Kennels have been custom built to comply with Pennsylvania Department of Agriculture's Dog Law Enforcement standards that were based on USDA Standards. The proposed changes of this section will require the demolition of Pennsylvania's licensed and inspected kennels and the rebuilding of entirely new dimensioned kennels. There is no scientific basis for the change; the average cost per kennel will be between \$30,000.00 and \$500,000.00 each.

The current proposed appears to be over idealistic in term of improving the welfare of dogs. I urge that this proposal be rescinded and an approach similar to the USDA standards be developed.

Yours truly,

*Rudy M. Leahy, Jr.*

2559

**James E Burkholder\***  
**316 Good Rd**  
**East Earl, PA 17519**

RECEIVED

January 30, 2007

2007 FEB -9 AM 11: 13

Independent Regulatory Review Commission  
Attn: Arthur Coccodrilli, Chairman  
333 Market Street, 14th Floor  
Harrisburg, PA 17101

INDEPENDENT REGULATORY  
REVIEW COMMISSION

Dear Chairman Coccodrilli,

I am writing in opposition to the proposed changes to the Dog Law Act 225 which was issued on December 16, 2006. I completely understand that substandard kennel conditions should not be permitted, but most of the proposed regulatory changes are impractical and costly.

These proposals call for change in definitions and requirements of licensed and inspected kennels within the Commonwealth. These extensive changes must go through Pennsylvania's House and Senate legislative processes.

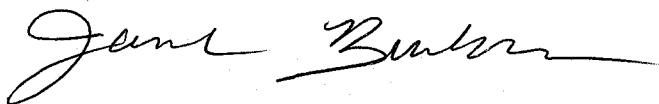
The proposed regulations call for the temperature of the kennel floor to be 50F<sup>o</sup> in the warm weather. Many kennels are air conditioned to a comfortable 70F<sup>o</sup>. A dog sleeping on a 50F<sup>o</sup> floor can develop hypothermia and become ill or die. For temperature, lighting, cleaning, exercise, housing, and veterinary care, the attending veterinarian should set forth and approve procedures specific for the kennel buildings and breeds of dogs.

Kennels have been custom built to comply with the Department of Agriculture's Dog Law Enforcement standards that were based on USDA standards. The proposed changes of this section will require the demolition of licensed and inspected kennels and the rebuilding of entirely new dimensioned kennels. The average cost per kennel will be between \$30,000.00 and \$500,000.00 each.

The proposed changes would require a substantial increase in manpower with many hours dedicated to filling out written bureaucratic reports and divert the small business owner's time away from caring for their animals.

I sincerely urge that this proposal be rescinded and the USDA standard be adopted in Pennsylvania.

Sincerely,



January 24, 2007

Arthur Coccodrilli, Chairman  
Independent Regulatory Review Commission  
333 Market Street, 14<sup>th</sup> Floor  
Harrisburg, PA 17101

RECEIVED

2007 FEB -8 AM 11: 21

INDEPENDENT REGULATORY  
REVIEW COMMISSION

Dear Chairman Coccodrilli,

As a Pennsylvania breeder, I am strongly opposed to the overly restrictive rules and regulations that are proposed for kennel owners. The enforcement of regulations such as these will effectively serve to shut down or severely curtail the activities of the concerned, caring and law-abiding breeders in Pennsylvania. The extensive number of regulations outlined in this proposal and the limited time allotted prevents the proper consultation and review of these regulations with our kennel veterinarian and other professionals. Therefore, in order to allow for the proper review and consultation of this extensive proposal, I request a ninety-day extension of the comment period.

As a Pennsylvania breeder, my goal and the goal of other law-abiding breeders is to raise the best quality and healthiest puppy possible. This is not the issue. Unfortunately, the issue created by this proposal is my rights as a citizen of this state to own property, and my rights to be afforded due process guaranteed by the provisions of our state's constitution. The vagueness of this proposal causes great concern that my rights as a citizen will be omitted by the bias opinion of those who will hear my side of the story.

As a Pennsylvania breeder, I am concerned that these overly burdensome regulations will have severe unforeseen consequences. These include reduced number of breeders willing to deal with the excessive administrative burden caused by these regulations. The shortages of puppies and resulting higher prices, which will encourage the import of oversea and out of state puppies. The ensuing shortages will provide a lucrative opportunity for those who operate beneath the law to fill these shortages. Those who participate in this black market will find the rewards well worth the risk. Additionally, the economic loss to the state will be in the millions, and will go far beyond the breeder to include pet supply retailers, cities who sponsor shows, and state tax revenue.

As a Pennsylvania breeder, I believe it is unfortunate that this proposal appears to be more about animal activism than about animal welfare. You only have to consider the one section that permits shelters and other similar facilities that provide a "service" to be exempt from these regulations. I immediately question the intent behind those who are pushing the governor on this issue. What sense does it make to remove animals from a substandard facility and place them in another substandard facility? None! Furthermore, this proposal has no incentives or educational programs for the breeders. It is all threats and punishment, which is another indication, that the motives of those supporting this proposal are more interested in eliminating our industry than in improving our industry.

Sincerely,

*Alvin W Zimmerman*

January 24, 2007

Arthur Coccodrilli, Chairman  
Independent Regulatory Review Commission  
333 Market Street, 14<sup>th</sup> Floor  
Harrisburg, PA 17101

RECEIVED

2007 FEB -8 AM 11: 21

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Sincerely,

*Ammon J. Weaver*



2559

January 24, 2007

Arthur Coccodrilli, Chairman  
Independent Regulatory Review Commission  
333 Market Street, 14<sup>th</sup> Floor  
Harrisburg, PA 17101

RECEIVED

2007 FEB -8 AM 11:21

INDEPENDENT REGULATORY  
REVIEW COMMISSION

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Sincerely,

*Mary Horst*

January 24, 2007

Arthur Coccodrilli, Chairman  
 Independent Regulatory Review Commission  
 333 Market Street, 14<sup>th</sup> Floor  
 Harrisburg, PA 17101

RECEIVED

2007 FEB -8 AM 11:22

INDEPENDENT REGULATORY  
 REVIEW COMMISSION

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Sincerely, *Michael Martin*

*Louella<sup>9</sup> Martin*

January 24, 2007

Arthur Coccodrilli, Chairman  
 Independent Regulatory Review Commission  
 333 Market Street, 14<sup>th</sup> Floor  
 Harrisburg, PA 17101

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2007 FEB -8 AM 11:22

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Sincerely,

*Warren  
 C. Molt  
 2-507*

January 24, 2007

Arthur Coccodrilli, Chairman  
Independent Regulatory Review Commission  
333 Market Street, 14<sup>th</sup> Floor  
Harrisburg, PA 17101

RECEIVED

2007 FEB -8 AM 11:22

INDEPENDENT REGULATORY  
REVIEW COMMISSION

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Sincerely,

*Levi S. Brybaker*  
Levi S Brybaker

2559

January 24, 2007

Arthur Coccodrilli, Chairman  
Independent Regulatory Review Commission  
333 Market Street, 14<sup>th</sup> Floor  
Harrisburg, PA 17101

RECEIVED

2007 FEB -8 AM 11: 22

INDEPENDENT REGULATORY  
REVIEW COMMISSION

Dear Chairman Coccodrilli,

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Sincerely,

*Emanuel Byle*

January 24, 2007

Arthur Coccodrilli, Chairman  
Independent Regulatory Review Commission  
333 Market Street, 14<sup>th</sup> Floor  
Harrisburg, PA 17101

RECEIVED

2007 FEB -8 AM 11: 22

INDEPENDENT REGULATORY  
REVIEW COMMISSION

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Sincerely,

*Elton Horning*

2559

January 24, 2007

Arthur Coccodrilli, Chairman  
Independent Regulatory Review Commission  
333 Market Street, 14<sup>th</sup> Floor  
Harrisburg, PA 17101

RECEIVED

2007 FEB -8 AM 11: 22

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Sincerely,

Reuben M Zook  
Reuben M. Zook  
34 Oak Bend Road  
Newburg PA 17240

2559

RECEIVED

Muskett Labradors  
974 Poho Poco Dr  
Lehighton, PA 18235

2007 FEB -8 AM 11:11

INDEPENDENT REGULATORY  
REVIEW COMMISSION

January 26, 2007

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

Dear Ms. Bender,

I am writing in response to the proposed amendments to the Dog Law Act 225 which was issued on December 16, 2006.

With a full understanding that the bureau is trying to improve substandard kennel conditions, I am not in agreement that most of the changes are necessary.

The proposed record keeping would require me to write down the date and time I washed each food and water bowl, every time a pen is cleaned; each individual outside run is cleaned, etc. It would be better for me to have my general daily procedures that I routinely follow, in writing. This is similar to how the USDA regulations are worded.

The proposed changes would also require the demolition of Pennsylvania's licensed and inspected kennels. Yet, there is no scientific basis for the change. In addition, the average cost to rebuild kennel will be between \$30,000.00 and \$500,000.00 each.

I sincerely urge that this proposal be withdrawn, as the beneficial outcome will be in question if the proposal is adopted.

Yours truly,

*Pat Dabulite* B.S. Animal Husbandry  
PA Vet Tech Licensed



2559

Moss Kennel  
113 Millport Rd  
West Mifflin, PA 15122

RECEIVED

2007 FEB -8 AM 11:11

January 26, 2007

INDEPENDENT REGULATORY  
REVIEW COMMISSION

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

Dear Ms. Bender,

I am writing in response to the proposed amendments to the Dog Law Act 225 which was issued on December 16, 2006.

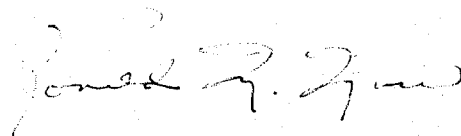
With a full understanding that the bureau is trying to improve substandard kennel conditions, I am not in agreement that most of the changes are necessary.

The proposed record keeping would require me to write down the date and time I washed each food and water bowl, every time a pen is cleaned; each individual outside run is cleaned, etc. It would be better for me to have my general daily procedures that I routinely follow, in writing. This is similar to how the USDA regulations are worded.

The proposed changes would also require the demolition of Pennsylvania's licensed and inspected kennels. Yet, there is no scientific basis for the change. In addition, the average cost to rebuild kennel will be between \$30,000.00 and \$500,000.00 each.

I sincerely urge that this proposal be withdrawn, as the beneficial outcome will be in question if the proposal is adopted.

Yours truly,



2559

**Kings Kennels**  
**329-A Centerville Rd**  
**Gordonville, PA 17529**

RECEIVED

2007 FEB -8 AM 11: 20

INDEPENDENT REGULATORY  
REVIEW COMMISSION

January 26, 2007

Independent Regulatory Review Commission  
Attn: Arthur Coccodrilli, Chairman  
333 Market Street, 14<sup>th</sup> Floor  
Harrisburg, PA 17101

Dear Chairman Coccodrilli,

I am writing in response to oppose the Dog Law Regulations Act 225 recently issued on December 16, 2006. The current regulatory proposals in general are unenforceable and extremely onerous when put into practice.

The proposed regulations call for kennels to be specific in regard to exercise and cleaning records. These would require a substantial increase in manpower and time dedicated to filling out written bureaucratic reports, it would be impossible to verify their accuracy. This change would also divert the small business owner's time away from caring for their animals.

The bureau already requires the name, address, acquisition date, disposition date, type of sale, breed, sex, color, whelping date, and identification number be recorded for each and every dog sold, transferred, adopted, or given away. If the department wishes to enforce the law, they already have all information needed.

Unless the kennel has purchased, sold, or transferred more than 26 dogs in a calendar year to the individual, it is impossible for the kennel to know if the individual is required to have a Pennsylvania kennel license.

Additionally, kennels have been custom built to comply with the Department of Agriculture's Dog Law Enforcement standards that were based on USDA standards. The proposed changes of this section will require the demolition of licensed and inspected kennels and the rebuilding of entirely new dimensioned kennels. The average cost per kennel will be between \$30,000.00 and \$500,000.00 each.

I sincerely urge that this proposal be rescinded and the USDA standard be adopted in Pennsylvania.

Yours Sincerely,



2559

**Judy's Pretty Pets**  
**168 Farmhouse Ln**  
**Carrolltown, PA 15722**

2007 FEB -8 AM 11: 20

INDEPENDENT REGULATORY  
REVIEW COMMISSION

January 20, 2007

Independent Regulatory Review Commission  
Attn: Arthur Coccodrilli, Chairman  
333 Market Street, 14<sup>th</sup> Floor  
Harrisburg, PA 17101

Dear Chairman Coccodrilli,

I am writing in response to oppose the Dog Law Regulations Act 225 recently issued on December 16, 2006. The current regulatory proposals in general are unenforceable and extremely onerous when put into practice.

The proposed regulations call for kennels to be specific in regard to exercise and cleaning records. These would require a substantial increase in manpower and time dedicated to filling out written bureaucratic reports, it would be impossible to verify their accuracy. This change would also divert the small business owner's time away from caring for their animals.


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Additionally, kennels have been custom built to comply with the Department of Agriculture's Dog Law Enforcement standards that were based on USDA standards. The proposed changes of this section will require the demolition of licensed and inspected kennels and the rebuilding of entirely new dimensioned kennels. The average cost per kennel will be between \$30,000.00 and \$500,000.00 each.

I sincerely urge that this proposal be rescinded and the USDA standard be adopted in Pennsylvania.

Yours Sincerely,



2559

RECEIVED

2007 FEB -8 AM 11:13

Bureau of Dog Law Enforcement  
Attn: Ms Mary Bender  
Pennsylvania Department of Agriculture  
2301 North Cameron Street  
Harrisburg, PA 171109408

INDEPENDENT REGULATORY  
REVIEW COMMISSION

Dear Ms Bender:

I am writing to you because I am concerned with the proposed amendments to the Pennsylvania Dog Law Regulations issued on December 16, 2006. I believe that proper regulation of kennels is necessary but I question the extent to which these laws go.

As a pet owner who uses boarding kennels I question the effects of this law on the current boarding kennels. How many kennels currently in business meet the requirements as listed? Would these new laws force the closure of smaller boarding facilities and a dramatic increase in the price of boarding my pets as other facilities spend a lot of money to meet the new building specifications? Would it also make it more difficult to find a boarding kennel if these new regulations force existing kennels to close?

Section 21.23 imposes extreme requirements as to space, exercising and record keeping..

The intense record keeping required here and in other parts of the act make it almost a full time job keeping up the paperwork. Wouldn't these requirements increase the need for personnel at a boarding facility, thereby increasing my costs? Is it really necessary to keep detailed accounts of every time a water dish is changed? Surely better use can be made of kennel personnel's time.

Section 21.23 also says that dogs of different size can not be exercised together. Currently if I have two dogs who live together they can be placed in the same run when boarded, if these two dogs are of different sizes this will no longer be possible. This will increase my expense as discounts are usually given if two dogs are boarded in the same run. If my dogs live together in my home why shouldn't they be allowed to be together when boarded? I would prefer they have the security of being together when separated from me.

Under the proposed regulations pets who are boarded but of different size would not even be able to play together at the Kennel. Animals that live together in my home all the time and are comfortable together should be able to interact together if it is necessary to board them.

Section 21.28 says food receptacles cannot be made of materials that a dog can destroy. This precludes a kennel from using disposable paper containers to feed dogs. What could be more sanitary than containers which are not reused? The time spent cleaning metal food dishes is time staff can't use doing other things. The kennel where I now board uses paper for feeding boarders. I am very pleased with this.

I ask that these recommendations not be accepted and that the board seek the opinions of those who are actively involved in breeding and caring for dogs. How many people from such backgrounds were involved in the creation of these changes?

I urge the withdrawal of the current proposal and an open dialogue with the groups in the state that are actively involved in the breeding and care of dogs prior to any new proposals being introduced.

Sincerely,

*Sue Scovil*  
*2749 Route 737*  
*Kempton PA 19529*

2559

RECEIVED

2007 FEB -8 AM 11:11

INDEPENDENT REGULATORY  
REVIEW COMMISSION

January 2007

Pennsylvania Department of Agriculture  
Bureau of Dog Law Enforcement  
Attn: Ms Mary Bender  
2301 North Cameron St  
Harrisburg PA 17110-9408

Dear Ms. Bender:

I recently heard from a co-worker who lives in Lancaster County about the proposed new and amended kennel regulations and at this time I would like to applaud you and your department for proposing these new regulations to improve the living conditions of the dogs in commercial breeding kennels. These changes have been a long time coming and I am pleased that these changes are in the near future.

I wanted to let you and your department know that I completely support the proposed kennel regulations and will be looking forward to their passing in the upcoming months!

I feel the amended regulations, such as removing the dogs from their cage before being cleaned, adequate lighting and necessary heating and cooling when applicable, will reflect the care standards that are needed to insure ethical and humane conditions needed for better overall quality of life for our canine companions.

The passage of these kennel regulations will also make Pennsylvania's Department of Agriculture a national leader and diminish Pennsylvania's reputation as "Puppy Mill Capital of the East Coast" something I am sure your department would like to be known for in future generations.

Once again, I support and encourage the passing of proposed kennel regulations!

Sincerely,

*Mark B. Wilton*

963 Byers Ave.

Chambersburg, PA 17201

2559

RECEIVED

2007 FEB -6 AM 11:12

INDEPENDENT REGULATORY  
REVIEW COMMISSION

January 2007

Pennsylvania Department of Agriculture  
Bureau of Dog Law Enforcement  
Attn: Ms Mary Bender  
2301 North Cameron St  
Harrisburg PA 17110-9408

Dear Ms. Bender:

I recently heard from a co-worker about the proposed new and amended kennel regulations and first off, I would like to thank the Bureau of Dog Law for proposing these new regulations to improve the living conditions of the dogs in commercial breeding kennels. I do not reside in Lancaster County, but understand that it is known as the puppy mill capital of the East coast and that needs to change.

I wanted to inform you and your department that I fully support the proposed kennel regulations and will be looking forward to their passing in the upcoming months!

I feel the amended regulations, such as removing the dogs from their cage before being cleaned, adequate lighting, walking each dog at least 20 minutes per day will reflect the care standards that are needed to insure ethical and humane conditions needed for better overall quality of life for our canine companions.

The passage of these kennel regulations will also make Pennsylvania's Department of Agriculture a national leader and diminish Pennsylvania's reputation as "Puppy Mill Capital of the East Coast" something I am sure your department would like to be known for in future generations.

Once again, I support and encourage the passing of proposed kennel regulations!

Sincerely,

*M. C. Cost*

*M. C. Cost  
5381 Lincoln Hwy  
York PA 17402*

2559

Ms. Mary Bender  
Pennsylvania Department of Agriculture  
2301 North Cameron Street  
Harrisburg, PA 17110-9408

RECEIVED

2007 FEB -8 AM 11:15

INDEPENDENT REGULATORY  
REVIEW COMMISSION

Re. Doc. No. 06-2452

Dear Ms. Bender,

It has been brought to my attention the newly proposed amendments to the PA dog law regulations. As the owner of ( a / several ) companion dog (s), I am writing to express my concerns and opposition to the proposed changes.

I purchased my dog directly from a reputable breeder, not a pet shop or large-scale commercial kennel, because I wanted the best chance at getting a healthy dog with a good temperament. I wanted to know that my puppy had been exposed to a variety of normal household situations and was prepared to live the life of a family companion. By buying directly from a breeder, I was able to see the conditions in which my puppy was raised.

The proposed changes, particularly those applying to "Kennels- Primary Enclosures", are of particular concern to me. It is my understanding that in these proposed changes, if a cumulative total of 26 dogs are housed at "the Establishment" during a calendar year, then licensed breeders will be required to have housing facilities that comply with the specifications outlined in the proposed changes. Small scale breeders who fall into the class 1 designation, would no longer be able to maintain, breed, whelp or raise their dogs within their homes. These breeders, who strive to produce dogs which are true to breed type, of good temperament, and, inasmuch as possible, free from genetic disorders, would be forced to either restrict their numbers or build facilities to meet the standards.

I credit my dog's good temperament to thoughtful breeding and to the love and attention that my breeder gave my puppy. Most importantly, this included exposure to everyday sights and sounds, such as:

- 1) My puppy was taken outside to potty on grass regularly. This is of importance to me, as it helped with the housebreaking process.
- 2) In a home situation, my puppy was exposed to different surfaces and noises such as kitchen appliances, television and other noises that occur in my home.
- 3) My puppy was given opportunity to interact with other dogs, helping with social skills needed to meet other dogs we come in contact with.

While I applaud the efforts to improve the living conditions for the dogs and puppies being raised in commercial facilities, I find it a great disservice to the reputable breeder, who standards far surpass in many ways, what these proposed amendments mandate. I, for one, want the choice to buy from a small scale, reputable breeder, and oppose these amendments.

Sincerely,

Idelle K. Ridder  
6441 Oakdale PK  
Morgantown WV 26051

2559

RECEIVED

2007 FEB -8 AM 11: 12

January 2007

Pennsylvania Department of Agriculture  
Bureau of Dog Law Enforcement  
Attn: Ms Mary Bender  
2301 North Cameron St  
Harrisburg PA 17110-9408

INDEPENDENT REGULATORY  
REVIEW COMMISSION

Dear Ms. Bender:

I recently heard from a co-worker about the proposed new and amended kennel regulations and first off, I would like to thank the Bureau of Dog Law for proposing these new regulations to improve the living conditions of the dogs in commercial breeding kennels.

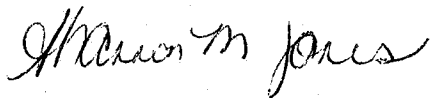
I fully support the proposed kennel regulations and welcome their passage!

Veterinarian practice, animal behaviorists and other animal care givers have substantiated the type and level of care these animals require for a healthy life. I feel the amended regulations will reflect these current care standards and are necessary to insure ethical and humane conditions needed for better overall quality of life.

The passage of these kennel regulations will also make Pennsylvania's Department of Agriculture a national leader and diminish Pennsylvania's reputation as "Puppy Mill Capital of the East Coast."

Once again, I support and encourage the proposed kennel regulations!

Sincerely,



Shannon M. Jones  
111 West Sunset Avenue  
Ephrata, PA 17522



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

RECEIVED

2007 FEB -8 AM 11:11

INDEPENDENT REGULATORY  
REVIEW COMMISSION

Dear Ms. Bender:

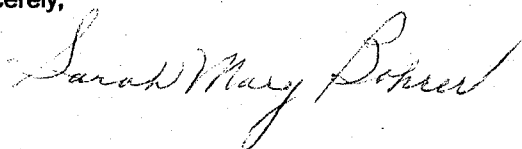
I am writing to comment on the proposed amendments to the Pennsylvania dog law regulations issued on December 16, 2006. I believe that inhumane and substandard kennel conditions should not be tolerated, but I do not agree that most of the proposed regulatory changes are needed, or would necessarily have a beneficial outcome if adopted. Many are impractical, excessively burdensome and costly, unenforceable, and/or will not improve the quality of life for the dogs in these kennels.

- \* The definition of "temporary housing" would require thousands of small residential hobby and show breeding households to become licensed which could not possibly comply with the regulations, and which there is no reason to regulate.
- \* The obligations of owners of "temporary housing" which are made subject to inspection by the proposal are not enumerated or limited.
- \* There is no scientific or accepted husbandry basis for the amended space and exercise requirements.
- \* The regulations will require wholesale renovation, if not rebuilding, of many kennels already built in compliance with current federal and/or state standards. There is no scientific foundation for the arbitrary, rigid engineering standards specified.
- \* Smaller breeders and dog owners who maintain their dogs in their own residential premises but are covered by the Pennsylvania dog law, who provide care and conditions far superior to those required by the proposed new standards, would be unable to comply with the rigid commercial kennel standards.
- \* The record keeping requirements with respect to exercise, cleaning, and other aspects of kennel management are excessively burdensome and serve no useful purpose, as it would be impossible to verify their accuracy in all but the most egregious circumstances. Such egregious circumstances already violate existing regulations.
- \* The proposals pertaining to housing and social interaction of dogs of different sizes are contrary to good husbandry, socialization and training practices.

The above is far from a complete list of the deficiencies with the proposed regulations. I also associate myself with the more detailed comments on this proposal by the Pennsylvania Federation of Dog Clubs.

The Bureau has tacitly conceded that its current regulations have not been adequately enforced. If, after implementing its recently announced enhanced enforcement program, the Bureau finds it is still unable to prevent inhumane treatment of dogs because of specific deficiencies in the existing regulations, it should cite these specific deficiencies and propose changes based on them. The current proposal appears to be merely a laundry list of ideas for improving the environment for dogs that has no connection to specific instances in which the welfare of dogs could not be secured and no basis in science or accepted canine husbandry practices. I urge that this proposal be withdrawn.

Sincerely,



2559

Lori Peters  
1064 Fairview Road  
Manheim, PA 17545

RECEIVED

2007 FEB -8 AM 11:11

INDEPENDENT REGULATORY  
REVIEW COMMISSION

January 18, 2007

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

Dear Ms. Bender,

I am writing in response to the proposed amendments to the Dog Law Act 225 which was issued on December 16, 2006.

With a full understanding that the bureau is trying to improve substandard kennel conditions, I am not in agreement that most of the changes are necessary.

The proposed record keeping would require me to write down the date and time I washed each food and water bowl, every time a pen is cleaned; each individual outside run is cleaned, etc. It would be better for me to have my general daily procedures that I routinely follow, in writing. This is similar to how the USDA regulations are worded.

The proposed changes would also require the demolition of Pennsylvania's licensed and inspected kennels. Yet, there is no scientific basis for the change. In addition, the average cost to rebuild kennel will be between \$30,000.00 and \$500,000.00 each.

I sincerely urge that this proposal be withdrawn, as the beneficial outcome will be in question if the proposal is adopted.

Yours truly,

*Lori M. Peters*

2559

Breezy View Kennel  
14910 Rt 119 South  
Rochester Mills, PA 15774

RECEIVED

January 31, 2007

2007 FEB 20 AM 11:16

Independent Regulatory Review Commission  
Attn: Arthur Coccodrilli, Chairman  
333 Market Street, 14th Floor  
Harrisburg, PA 17101

INDEPENDENT REGULATORY  
REVIEW COMMISSION

Dear Chairman Coccodrilli,

I am writing in opposition to the proposed changes to the Dog Law Act 225 which was issued on December 16, 2006. I completely understand that substandard kennel conditions should not be permitted, but most of the proposed regulatory changes are impractical and costly.

These proposals call for change in definitions and requirements of licensed and inspected kennels within the Commonwealth. These extensive changes must go through Pennsylvania's House and Senate legislative processes.

The proposed regulations call for the temperature of the kennel floor to be 50F° in the warm weather. Many kennels are air conditioned to a comfortable 70F°. A dog sleeping on a 50F° floor can develop hypothermia and become ill or die. For temperature, lighting, cleaning, exercise, housing, and veterinary care, the attending veterinarian should set forth and approve procedures specific for the kennel buildings and breeds of dogs.

Kennels have been custom built to comply with the Department of Agriculture's Dog Law Enforcement standards that were based on USDA standards. The proposed changes of this section will require the demolition of licensed and inspected kennels and the rebuilding of entirely new dimensioned kennels. The average cost per kennel will be between \$30,000.00 and \$500,000.00 each.

The proposed changes would require a substantial increase in manpower with many hours dedicated to filling out written bureaucratic reports and divert the small business owner's time away from caring for their animals.

I sincerely urge that this proposal be rescinded and the USDA standard be adopted in Pennsylvania.

Sincerely,

Rachel Marshall  
owner

2559

**Caper's Acres Kennel**  
**623 East Reliance Rd**  
**Telford, PA 18969**

RECEIVED

2007 FEB 20 AM 11:15

January 30, 2007

Independent Regulatory Review Commission  
Attn: Arthur Coccodrilli, Chairman  
333 Market Street, 14th Floor  
Harrisburg, PA 17101

INDEPENDENT REGULATORY  
REVIEW COMMISSION

Dear Chairman Coccodrilli,

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The proposed changes would require a substantial increase in manpower with many hours dedicated to filling out written bureaucratic reports and divert the small business owner's time away from caring for their animals.

I sincerely urge that this proposal be rescinded and the USDA standard be adopted in Pennsylvania.

Sincerely,



2559

**Caper's Acres Kennel**  
**623 East Reliance Rd**  
**Telford, PA 18969**

RECEIVED

2007 FEB 20 AM 11:15

January 30, 2007

Independent Regulatory Review Commission  
Attn: Arthur Coccodrilli, Chairman  
333 Market Street, 14th Floor  
Harrisburg, PA 17101

INDEPENDENT REGULATORY  
REVIEW COMMISSION

Dear Chairman Coccodrilli,

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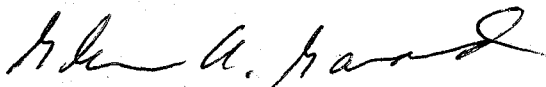
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The proposed changes would require a substantial increase in manpower with many hours dedicated to filling out written bureaucratic reports and divert the small business owner's time away from caring for their animals.

I sincerely urge that this proposal be rescinded and the USDA standard be adopted in Pennsylvania.

Sincerely,



2559

**Caper's Acres Kennel**  
**623 East Reliance Rd**  
**Telford, PA 18969**

RECEIVED

2007 FEB 20 AM 11:16

INDEPENDENT REGULATORY  
REVIEW COMMISSION

January 30, 2007

Independent Regulatory Review Commission  
Attn: Arthur Coccodrilli, Chairman  
333 Market Street, 14th Floor  
Harrisburg, PA 17101

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The proposed changes would require a substantial increase in manpower with many hours dedicated to filling out written bureaucratic reports and divert the small business owner's time away from caring for their animals.

I sincerely urge that this proposal be rescinded and the USDA standard be adopted in Pennsylvania.

Sincerely,

*Arthur Coccodrilli*

2559

**Burkenhaus Kennel**  
**4037 E. Berlin Rd**  
**Thomasville, PA 17364**

RECEIVED

2007 FEB 20 AM 11:16

January 30, 2007

Independent Regulatory Review Commission  
Attn: Arthur Coccodrilli, Chairman  
333 Market Street, 14th Floor  
Harrisburg, PA 17101

INDEPENDENT REGULATORY  
REVIEW COMMISSION

Dear Chairman Coccodrilli,

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These proposals call for change in definitions and requirements of licensed and inspected kennels within the Commonwealth. These extensive changes must go through Pennsylvania's House and Senate legislative processes.

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The proposed changes would require a substantial increase in manpower with many hours dedicated to filling out written bureaucratic reports and divert the small business owner's time away from caring for their animals.

I sincerely urge that this proposal be rescinded and the USDA standard be adopted in Pennsylvania.

Sincerely,

*Joseph B. Burkenhaus Sr.*

2559

**Diane L. Burkholder**  
**316 Good Rd**  
**East Earl, PA 17519**

RECEIVED

2007 FEB 20 AM 11:16

January 30, 2007

Independent Regulatory Review Commission  
Attn: Arthur Coccodrilli, Chairman  
333 Market Street, 14th Floor  
Harrisburg, PA 17101

INDEPENDENT REGULATORY  
REVIEW COMMISSION

Dear Chairman Coccodrilli,

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The proposed changes would require a substantial increase in manpower with many hours dedicated to filling out written bureaucratic reports and divert the small business owner's time away from caring for their animals.

I sincerely urge that this proposal be rescinded and the USDA standard be adopted in Pennsylvania.

Sincerely,

*Diane L. Burkholder*



Personal comment included

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

February 2, 2007

RE: Comments on proposed Dog Law regulations

Dear Ms. Bender,

As a concerned citizen of the state of Pennsylvania, I respectfully submit this comment on the proposed changes to the Dog Law regulations.

First, I would like to commend the Department of Agriculture and the Bureau of Dog Law Enforcement for proposing amendments to the Dog Law Regulations to improve conditions for dogs housed and bred in commercial breeding operations in Pennsylvania. **It should also be noted that the proposed changes to the regulations do not bring hobby breeders under the Act. The same people who were exempt from the former regulations (i.e. hobby breeders who raise, breed, move, sell, etc. fewer than 26 dogs per year), will continue to be exempt under the revised regulations.**

Furthermore, I fully support the comments submitted by the American Society for the Prevention of Cruelty to Animals (ASPCA) on behalf of its members, and incorporate them herein by reference. Specifically, I strongly support the following:

1. The penalties in § 21.4(1)(iii) for "failure of an individual to comply with licensure provisions" should be increased from \$25 to \$300 per violation to \$25 to \$300 *per day of violation*.
2. The Secretary should be mandating to file suit to enjoin operation of unlicensed kennels where the kennel is not in compliance with the standards in the regulations and is unable to qualify for a license.
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*Ann M. Buda - Inella*

*personal comment: As a nurse working in the field of neonatology for 30 years, I remember when it was a common belief that neonates especially premature ones*

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

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Barbara Good  
609 Virginia Ave Exp, Pottsville, PA 15215

\* A female Sheltie I adopted through Sheltie rescue had been used as a breed bitch at a facility in PA. When I set her outside on the ground the day I got her, she jumped up and down like she was on hot coals. She had obviously been on wire mesh her entire life until then.

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✓ THIS PAST SUMMER, SEVERAL GRE HOUND DIED IN A FIRE - THEY WERE "STUCKED" IN A TRAILER, @ WHEELING DOGMA'S

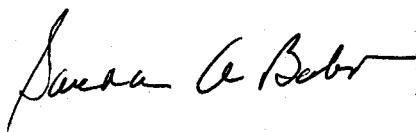
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P.S. "PA" MUST LOOSE IT'S TITLE OF "PUPPY MILL CAPITAL IN THE EAST"

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SHARI A. LEARISH  
524 E. 11TH ST.  
CLFJ, PA 16830

PLEASE HELP STOP  
THE ABUSE!

THANK YOU FOR  
YOUR EFFORTS!

Bureau of Dog Law Enforcement  
Pennsylvania Department of Agriculture  
Attn: Ms. Mary Bender  
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P.O. Box 655  
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9. The section on wire mesh flooring should be amended to make it at least as strict as the federal Animal Welfare Act, which requires that metal strand flooring be greater than one-eighth of an inch in diameter (9 gauge) or coated with a material such as plastic or fiberglass. Language should also be added requiring that all primary enclosures that have wire mesh flooring also have a resting board of sufficient size to allow each dog in the enclosure to lie in a full lateral recumbent position and be able to make normal postural adjustments. Resting boards are necessary to provide for the comfort of the dog and to allow the animal to have some time away from living on grated fencing. Providing resting boards will result in fewer foot lesions and other foot and leg injuries to the dogs. A solid resting surface that is impervious to moisture is also a more natural environment for the animal, provides a draft-free surface and enables the dog to retain its body heat. A dog feels most vulnerable when lying down, and forcing a dog to lie over an exposed area can contribute to anxiety. Humane standards and survival standards are separate, and creating an environment that merely allows for survival does not necessarily make such an environment humane.

10. Contrary to what the breeding industry states, the engineering standards specified in the proposed regulations do have a scientific foundation. The standards in the proposed regulations are more akin to acceptable husbandry practices. They will bring the engineering standards up to par with, if not above, those set forth in the Animal Welfare Act. Contrary to the hobby breeders' contention, the new regulations will not bring hobby breeders under the purview of the Dog Law. Only kennels that keep, harbor, board, shelter, sell, give away, or transfer a cumulative total of 26 or more dogs in one calendar year will be required to comply with the new regulations. As a result, true hobby breeders are still exempt from the law. Good husbandry practices dictate that anyone harboring a larger number of dogs (26 or more) should comply with certain engineering standards to ensure the health, safety, and well-being of the dogs. The Dog Law and its regulations are aimed at regulating larger and commercial breeding facilities. Therefore, the new regulations will not affect hobby breeders, contrary to what the breeding community suggests.

Once again, I commend the Department of Agriculture and the Bureau of Dog Law Enforcement for proposing regulations that will improve the conditions for dogs housed and bred in Pennsylvania's commercial kennels. The changes I have noted above will further ensure that such dogs are protected. Thank you for your time and consideration.

Sincerely,



P.S. Please help stop the torture of these animals

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

February 2, 2007

RE: Comments on proposed Dog Law regulations

Dear Ms. Bender,

As a concerned citizen of the state of Pennsylvania, I respectfully submit this comment on the proposed changes to the Dog Law regulations.

First, I would like to commend the Department of Agriculture and the Bureau of Dog Law Enforcement for proposing amendments to the Dog Law Regulations to improve conditions for dogs housed and bred in commercial breeding operations in Pennsylvania. **It should also be noted that the proposed changes to the regulations do not bring hobby breeders under the Act. The same people who were exempt from the former regulations (i.e. hobby breeders who raise, breed, move, sell, etc. fewer than 26 dogs per year), will continue to be exempt under the revised regulations.**

Furthermore, I fully support the comments submitted by the American Society for the Prevention of Cruelty to Animals (ASPCA) on behalf of its members, and incorporate them herein by reference. Specifically, I strongly support the following:

1. The penalties in § 21.4(1)(iii) for "failure of an individual to comply with licensure provisions" should be increased from \$25 to \$300 per violation to \$25 to *\$300 per day of violation*.
2. The Secretary should be mandating to file suit to enjoin operation of unlicensed kennels where the kennel is not in compliance with the standards in the regulations and is unable to qualify for a license.
3. I commend the Department of Agriculture and the Bureau of Dog Law Enforcement for **doubling the required cage size. This is perhaps the most important change that can be made to improve the quality of life for dogs in commercial breeding facilities in Pennsylvania.** This provision should remain in the regulations regardless of opposition from breeders. This section should be further strengthened by adding a provision stating that where more than one dog is housed in a primary enclosure, the primary enclosure must provide adequate space for all dogs. For instance, if the enclosure houses two dogs, it must provide double the cage space that would be required for a single dog. If it houses three dogs, it must provide three times the cage space, etc.



4. I also commend the Department of Agriculture and Bureau of Dog Law Enforcement for including a provision that requires the dog wardens to visually observe the physical condition of each dog. However, the provisions regarding orders of veterinary care should be strengthened to state that the owner must provide "proof of *current and proper* veterinary care for the dog." This provision should also be amended to include excessive matting and excessively long toenails as indications of lack of proper veterinary care. Inadequate grooming can lead to painful medical issues for dogs, including skin lesions from excessive matting and leg and joint injuries from failure to keep toenails appropriately trimmed. Moreover, the section should be amended to *require* dog wardens to order a veterinary check on dogs that exhibit signs of infection, contagious disease or parasite; or that appear to be in poor health where proof of current and proper veterinary care is not provided.

5. A new subsection should be added to § 21.30 clarifying the required training for dog wardens. Training in the following areas should be added into the regulations to expand upon the requirements set forth in 3 P.S. § 459-901:

1. State laws relating to dog licensing, control and owner responsibilities;
2. State and federal laws relating to animal care, cruelty and neglect;
3. State laws relating to dangerous dogs;
4. State and federal law relating to lack of arrest powers, proper use of search, seizure and warrants;
5. State and federal laws relating to pounds and shelters;
6. Basics of cruelty and neglect investigations for referral to appropriate authorities;
7. Report-writing and record-keeping;
8. Overview of the legal system, court structure and terminology;
9. Basics of interpreting animal behavior;
10. Identification of injury, disease, abuse and neglect in dogs;
11. Animal hoarders; and
12. Civil liability issues.

6. A new section should be added to the regulations mandating that the Department and dog wardens coordinate and work with law enforcement when applicable. It is imperative that the department work with law enforcement, and specifically Humane Society police officers, to ensure that both the cruelty laws and the Dog Law are adequately enforced.

7. A new section should be added to the regulations requiring that a licensee must have enough employees to carry out the level of husbandry practices and care required by the Act and its regulations. Additionally, the employees who provide for care and husbandry or handle animals should be supervised by an individual who has the knowledge, background, and experience in proper husbandry and care of dogs to supervise others. The licensee must be certain that the supervisor and other employees can perform to such standards.

8. Stacking primary enclosures on top of one another should be prohibited. Stacking cages creates an unnatural environment for the dogs. Additionally, it makes observation of the dogs more difficult and creates sanitation problems. Even with a tray or partition between cages, it is likely that the partitions may overflow, causing feces, urine, food, water, and hair to fall onto the dogs located in the cages below.

9. The section on wire mesh flooring should be amended to make it at least as strict as the federal Animal Welfare Act, which requires that metal strand flooring be greater than one-eighth of an inch in diameter (9 gauge) or coated with a material such as plastic or fiberglass. Language should also be added requiring that all primary enclosures that have wire mesh flooring also have a resting board of sufficient size to allow each dog in the enclosure to lie in a full lateral recumbent position and be able to make normal postural adjustments. Resting boards are necessary to provide for the comfort of the dog and to allow the animal to have some time away from living on grated fencing. Providing resting boards will result in fewer foot lesions and other foot and leg injuries to the dogs. A solid resting surface that is impervious to moisture is also a more natural environment for the animal, provides a draft-free surface and enables the dog to retain its body heat. A dog feels most vulnerable when lying down, and forcing a dog to lie over an exposed area can contribute to anxiety. Humane standards and survival standards are separate, and creating an environment that merely allows for survival does not necessarily make such an environment humane.

10. Contrary to what the breeding industry states, the engineering standards specified in the proposed regulations do have a scientific foundation. The standards in the proposed regulations are more akin to acceptable husbandry practices. They will bring the engineering standards up to par with, if not above, those set forth in the Animal Welfare Act. Contrary to the hobby breeders' contention, the new regulations will not bring hobby breeders under the purview of the Dog Law. Only kennels that keep, harbor, board, shelter, sell, give away, or transfer a cumulative total of 26 or more dogs in one calendar year will be required to comply with the new regulations. As a result, true hobby breeders are still exempt from the law. Good husbandry practices dictate that anyone harboring a larger number of dogs (26 or more) should comply with certain engineering standards to ensure the health, safety, and well-being of the dogs. The Dog Law and its regulations are aimed at regulating larger and commercial breeding facilities. Therefore, the new regulations will not affect hobby breeders, contrary to what the breeding community suggests.

Once again, I commend the Department of Agriculture and the Bureau of Dog Law Enforcement for proposing regulations that will improve the conditions for dogs housed and bred in Pennsylvania's commercial kennels. The changes I have noted above will further ensure that such dogs are protected. Thank you for your time and consideration.

Sincerely,

Roberta Maurer

As the wife of a building inspector, who must inspect "puppy mills," I have seen him come home so upset that this is going on in Lancaster County.  
Please help put an end to this "industry."

Addendum:

The proposed changes are riddled with excessive paperwork.

The section requiring every dog to be walked on a leash is not as healthy for a dog as "free exercise" in a fenced and safe play area, or gravel or concrete runs that they can be let into 2-3 times a day. Just "walking" 26 dogs would require 8-6 hours out of an already busy day involving cleaning, feeding, watering and many other activities linked to the dogs care and welfare.

Sincerely,

Caryl McCall

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

January 30, 2007

Dear Ms. Bender.

I am writing in response to the Dog Law Act 225 that was issued on December 16, 2006, of which I have several disagreements. The regulatory proposals in general are very difficult and costly to enforce, extremely onerous, and not feasible when put in to practice.

The new proposal only permits a licensed kennel to buy from another licensed kennel. This is fraud for the following reasons:

1. Unless the kennel has purchased, sold, or transferred more than 26 dogs in a calendar year to the individual, it is impossible for the kennel to know if the individual is required to have a Pennsylvania kennel license.
2. It is unlawful for the department to regulate and inspect kennels outside of Pennsylvania.
3. The Pennsylvania Department of Agriculture Dog Law Enforcement Bureau already requires the name, address, acquisition date, disposition date, type of sale, breed, sex, color, whelping date, and identification number be recorded for each and every dog sold, transferred, adopted, or given away. If the Department wishes to enforce the law, they already have all information needed.

The proposals referencing to housing and social interaction of dogs of different sizes are contrary to good husbandry, socializing and training practices. Moreover, there is no scientific or accepted husbandry basis for the amended space and exercise requirements.

The current proposal claims to be a general list of ideas to improve the breeding environment for dogs, which are neither substantiated by science nor attributed as accepted canine husbandry practices. A better idea would be for Pennsylvania to adopt USDA type standards. I sincerely request that this proposal be withdrawn.

Yours Sincerely,

*Helen Wesner*



*Helen & Don Wesner  
1845 Plum Creek Road  
Roaring Spring PA 16673*

Robert W. Mikulski  
157 Misty Meadows Road  
Mount Pleasant, PA 15666

January 23, 2007

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

Dear Ms. Bender,

I am writing in response to the proposed amendments to the Dog Law Act 225 which was issued on December 16, 2006.

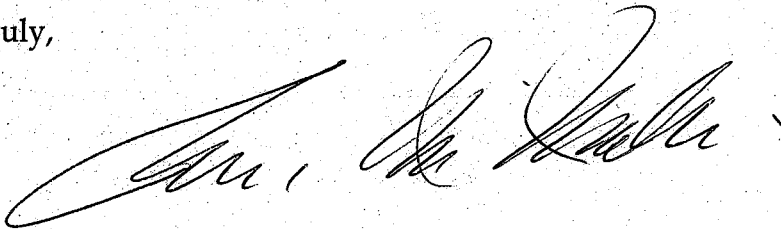
With a full understanding that the bureau is trying to improve substandard kennel conditions, I am not in agreement that most of the changes are necessary.

The proposed record keeping would require me to write down the date and time I washed each food and water bowl, every time a pen is cleaned; each individual outside run is cleaned, etc. It would be better for me to have my general daily procedures that I routinely follow, in writing. This is similar to how the USDA regulations are worded.

The proposed changes would also require the demolition of Pennsylvania's licensed and inspected kennels. Yet, there is no scientific basis for the change. In addition, the average cost to rebuild kennel will be between \$30,000.00 and \$500,000.00 each.

I sincerely urge that this proposal be withdrawn, as the beneficial outcome will be in question if the proposal is adopted.

Yours truly,



Misty Meadow Kennel  
155 Misty Meadow Rd  
Mount Pleasant, PA 15666

January 23, 2007

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

Dear Ms. Bender,

I am writing in response to the proposed amendments to the Dog Law Act 225 which was issued on December 16, 2006.

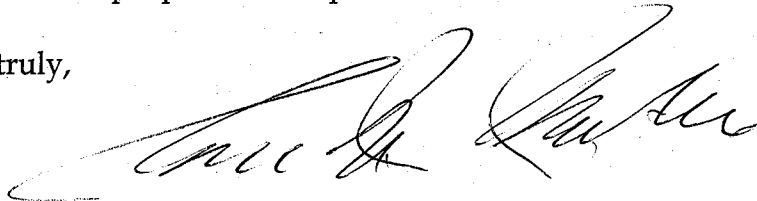
With a full understanding that the bureau is trying to improve substandard kennel conditions, I am not in agreement that most of the changes are necessary.

The proposed record keeping would require me to write down the date and time I washed each food and water bowl, every time a pen is cleaned; each individual outside run is cleaned, etc. It would be better for me to have my general daily procedures that I routinely follow, in writing. This is similar to how the USDA regulations are worded.

The proposed changes would also require the demolition of Pennsylvania's licensed and inspected kennels. Yet, there is no scientific basis for the change. In addition, the average cost to rebuild kennel will be between \$30,000.00 and \$500,000.00 each.

I sincerely urge that this proposal be withdrawn, as the beneficial outcome will be in question if the proposal is adopted.

Yours truly,

A handwritten signature in black ink, appearing to read "Misty Meadow Kennel" or similar, written in a cursive style.

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

January 31, 2007

Dear Ms. Bender,

I am writing to express a few concerns that I have with regard to the proposed Dog Law Act 225, which was issued on December 16, 2006.

I appreciate that fact that the bureau has helped to improve the dog laws in the past several years. However, the current proposed regulation changes have appeared to be intentionally burdensome and go far beyond mere rulemaking.

The proposals add completely new categories and definition. These changes must be addressed through the legislative process.

The proposed changes require the kennel owner to record every time a water bowl or food pan is washed, every time the primary and secondary pen enclosures are cleaned, and the feeding and watering dates and times, etc. All these burdensome and excessive requirements will require a substantial increase in manpower with many hours dedicated to filling out written bureaucratic reports and divert the small business owner's time away from caring for their animals.

The Departments direction and intentions are neither attributed as accepted canine husbandry practices nor substantiated by science. The Department should base their changes on education to improve the industry. I request that this proposal be withdrawn.

Yours sincerely,

The Animal House  
Everglade Rd  
Greensburg, PA 15601

*Harrell Weldon*  
*Nila Weldon*

2559

John Mark Stoltzfus  
186 Blank Road  
Narvon, PA 17555

RECEIVED

2007 FEB -8 AM 11:12

INDEPENDENT REGULATORY  
REVIEW COMMISSION

January 19, 2007

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

Dear Ms. Bender,

I am writing in response to oppose the Dog Law Regulations Act 225 recently issued on December 16, 2006. The current regulatory proposals in general are unenforceable and extremely onerous when put into practice.

The proposed regulations call for kennels to be specific in regard to exercise and cleaning records. These would require a substantial increase in manpower and time dedicated to filling out written bureaucratic reports, and it would be impossible to verify their accuracy. This change would also divert the small business owner's time away from caring for their animals.

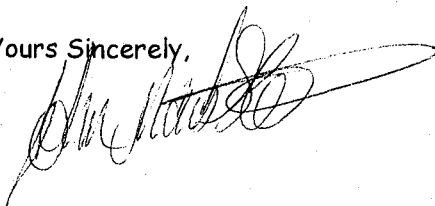
The bureau already requires the name, address, acquisition date, disposition date, type of sale, breed, sex, color, whelping date, and identification number be recorded for each and every dog sold, transferred, adopted, or given away. If the department wishes to enforce the law, they already have all information needed.

Unless the kennel has purchased, sold, or transferred more than 26 dogs in a calendar year to the individual, it is impossible for the kennel to know if the individual is required to have a Pennsylvania kennel license.

Additionally, kennels have been custom built to comply with the Department of Agriculture's Dog Law Enforcement standards that were based on USDA standards. The proposed changes of this section will require the demolition of licensed and inspected kennels and the rebuilding of entirely new dimensioned kennels. The average cost per kennel will be between \$30,000.00 and \$500,000.00 each.

I sincerely urge that this proposal be rescinded and the USDA standard be adopted in Pennsylvania.

Yours Sincerely,





2559

**Kri-Del Kennel**  
**1750 Kinderhook Rd**  
**Columbia, PA 17512**

RECEIVED

FEB -8 AM 11:12

INDEPENDENT REGULATORY  
REVIEW COMMISSION

January 26, 2007

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

Dear Ms. Bender,

I am writing in response to oppose the Dog Law Regulations Act 225 recently issued on December 16, 2006. The current regulatory proposals in general are unenforceable and extremely onerous when put into practice.

The proposed regulations call for kennels to be specific in regard to exercise and cleaning records. These would require a substantial increase in manpower and time dedicated to filling out written bureaucratic reports, and it would be impossible to verify their accuracy. This change would also divert the small business owner's time away from caring for their animals.

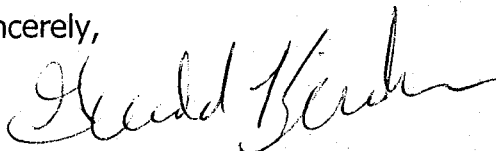
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Unless the kennel has purchased, sold, or transferred more than 26 dogs in a calendar year to the individual, it is impossible for the kennel to know if the individual is required to have a Pennsylvania kennel license.

Additionally, kennels have been custom built to comply with the Department of Agriculture's Dog Law Enforcement standards that were based on USDA standards. The proposed changes of this section will require the demolition of licensed and inspected kennels and the rebuilding of entirely new dimensioned kennels. The average cost per kennel will be between \$30,000.00 and \$500,000.00 each.

I sincerely urge that this proposal be rescinded and the USDA standard be adopted in Pennsylvania.

Yours Sincerely,



2559

**Kish Creek Kennel**  
**290-A S. Kish St**  
**Belleville, PA 17004**

RECEIVED

FEB -8 AM 11:11

INDEPENDENT REGULATORY  
REVIEW COMMISSION

January 26, 2007

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

Dear Ms. Bender,

I am writing in response to oppose the Dog Law Regulations Act 225 recently issued on December 16, 2006. The current regulatory proposals in general are unenforceable and extremely onerous when put into practice.

The proposed regulations call for kennels to be specific in regard to exercise and cleaning records. These would require a substantial increase in manpower and time dedicated to filling out written bureaucratic reports, and it would be impossible to verify their accuracy. This change would also divert the small business owner's time away from caring for their animals.

The bureau already requires the name, address, acquisition date, disposition date, type of sale, breed, sex, color, whelping date, and identification number be recorded for each and every dog sold, transferred, adopted, or given away. If the department wishes to enforce the law, they already have all information needed.

Unless the kennel has purchased, sold, or transferred more than 26 dogs in a calendar year to the individual, it is impossible for the kennel to know if the individual is required to have a Pennsylvania kennel license.

Additionally, kennels have been custom built to comply with the Department of Agriculture's Dog Law Enforcement standards that were based on USDA standards. The proposed changes of this section will require the demolition of licensed and inspected kennels and the rebuilding of entirely new dimensioned kennels. The average cost per kennel will be between \$30,000.00 and \$500,000.00 each.

I sincerely urge that this proposal be rescinded and the USDA standard be adopted in Pennsylvania.

Yours Sincerely,

*Mary M. Kanagy*  
Mary M. Kanagy

2559

**Elam Kanagy**  
**290 A Kish St.**  
**Belleville, PA 17004**

RECEIVED

2007 FEB -8 AM 11:11

INDEPENDENT REGULATORY  
REVIEW COMMISSION

January 20, 2007

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

Dear Ms. Bender,

I am writing in response to oppose the Dog Law Regulations Act 225 recently issued on December 16, 2006. The current regulatory proposals in general are unenforceable and extremely onerous when put into practice.

The proposed regulations call for kennels to be specific in regard to exercise and cleaning records. These would require a substantial increase in manpower and time dedicated to filling out written bureaucratic reports, and it would be impossible to verify their accuracy. This change would also divert the small business owner's time away from caring for their animals.

The bureau already requires the name, address, acquisition date, disposition date, type of sale, breed, sex, color, whelping date, and identification number be recorded for each and every dog sold, transferred, adopted, or given away. If the department wishes to enforce the law, they already have all information needed.

Unless the kennel has purchased, sold, or transferred more than 26 dogs in a calendar year to the individual, it is impossible for the kennel to know if the individual is required to have a Pennsylvania kennel license.

Additionally, kennels have been custom built to comply with the Department of Agriculture's Dog Law Enforcement standards that were based on USDA standards. The proposed changes of this section will require the demolition of licensed and inspected kennels and the rebuilding of entirely new dimensioned kennels. The average cost per kennel will be between \$30,000.00 and \$500,000.00 each.

I sincerely urge that this proposal be rescinded and the USDA standard be adopted in Pennsylvania.

Yours Sincerely,

*Elam S. Kanagy*  
*Mary M. Kanagy*

2559

**Crist K. King**  
**2150 Smyrna Rd**  
**Paradise, PA 17562**

RECEIVED

2007 FEB -8 AM 11:15

INDEPENDENT REGULATORY  
REVIEW COMMISSION

January 26, 2007

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

Dear Ms. Bender,

I am writing in response to oppose the Dog Law Regulations Act 225 recently issued on December 16, 2006. The current regulatory proposals in general are unenforceable and extremely onerous when put into practice.

The proposed regulations call for kennels to be specific in regard to exercise and cleaning records. These would require a substantial increase in manpower and time dedicated to filling out written bureaucratic reports, and it would be impossible to verify their accuracy. This change would also divert the small business owner's time away from caring for their animals.

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Unless the kennel has purchased, sold, or transferred more than 26 dogs in a calendar year to the individual, it is impossible for the kennel to know if the individual is required to have a Pennsylvania kennel license.

Additionally, kennels have been custom built to comply with the Department of Agriculture's Dog Law Enforcement standards that were based on USDA standards. The proposed changes of this section will require the demolition of licensed and inspected kennels and the rebuilding of entirely new dimensioned kennels. The average cost per kennel will be between \$30,000.00 and \$500,000.00 each.

I sincerely urge that this proposal be rescinded and the USDA standard be adopted in Pennsylvania.

Yours Sincerely,

*Crist K. King*  
*Loyce Ann King*

2559

**Henry U Stoltzfus**  
**1442 South Garfield Road**  
**Mount Joy, PA 17552**

RECEIVED

2007 FEB -8 AM 11:11

INDEPENDENT REGULATORY  
REVIEW COMMISSION

January 12, 2007

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

Dear Ms. Bender,

I am writing in response to oppose the Dog Law Regulations Act 225 recently issued on December 16, 2006. The current regulatory proposals in general are unenforceable and extremely onerous when put into practice.

The proposed regulations call for kennels to be specific in regard to exercise and cleaning records. These would require a substantial increase in manpower and time dedicated to filling out written bureaucratic reports, and it would be impossible to verify their accuracy. This change would also divert the small business owner's time away from caring for their animals.

The bureau already requires the name, address, acquisition date, disposition date, type of sale, breed, sex, color, whelping date, and identification number be recorded for each and every dog sold, transferred, adopted, or given away. If the department wishes to enforce the law, they already have all information needed.

Unless the kennel has purchased, sold, or transferred more than 26 dogs in a calendar year to the individual, it is impossible for the kennel to know if the individual is required to have a Pennsylvania kennel license.

Additionally, kennels have been custom built to comply with the Department of Agriculture's Dog Law Enforcement standards that were based on USDA standards. The proposed changes of this section will require the demolition of licensed and inspected kennels and the rebuilding of entirely new dimensioned kennels. The average cost per kennel will be between \$30,000.00 and \$500,000.00 each.

I sincerely urge that this proposal be rescinded and the USDA standard be adopted in Pennsylvania.

Yours Sincerely,

*Henry U. Stoltzfus*

2559

RECEIVED

Ms. Mary Bender  
Pennsylvania Department of Agriculture  
2301 North Cameron Street  
Harrisburg, PA 17110-9408

2007 FEB -7 PM 2:14

INDEPENDENT REGULATORY  
REVIEW COMMISSION

Re. Doc. No. 06-2452

Dear Ms. Bender,

It has been brought to my attention the newly proposed amendments to the PA dog law regulations. As the owner of ( a / several ) companion dog (s), I am writing to express my concerns and opposition to the proposed changes.

I purchased my dog directly from a reputable breeder, not a pet shop or large-scale commercial kennel, because I wanted the best chance at getting a healthy dog with a good temperament. I wanted to know that my puppy had been exposed to a variety of normal household situations and was prepared to live the life of a family companion. By buying directly from a breeder, I was able to see the conditions in which my puppy was raised.

The proposed changes, particularly those applying to "Kennels- Primary Enclosures", are of particular concern to me. It is my understanding that in these proposed changes, if a cumulative total of 26 dogs are housed at "the Establishment" during a calendar year, then licensed breeders will be required to have housing facilities that comply with the specifications outlined in the proposed changes. Small scale breeders who fall into the class 1 designation, would no longer be able to maintain, breed, whelp or raise their dogs within their homes. These breeders, who strive to produce dogs which are true to breed type, of good temperament, and, inasmuch as possible, free from genetic disorders, would be forced to either restrict their numbers or build facilities to meet the standards.

I credit my dog's good temperament to thoughtful breeding and to the love and attention that my breeder gave my puppy. Most importantly, this included exposure to everyday sights and sounds, such as:

- 1) My puppy was taken outside to potty on grass regularly. This is of importance to me, as it helped with the housebreaking process.
- 2) In a home situation, my puppy was exposed to different surfaces and noises such as kitchen appliances, television and other noises that occur in my home.
- 3) My puppy was given opportunity to interact with other dogs, helping with social skills needed to meet other dogs we come in contact with.

While I applaud the efforts to improve the living conditions for the dogs and puppies being raised in commercial facilities, I find it a great disservice to the reputable breeder, who standards far surpass in many ways, what these proposed amendments mandate. I, for one, want the choice to buy from a small scale, reputable breeder, and oppose these amendments.

Sincerely,

*Mark A Lilley*

Mark A Lilley  
2734 Aritha Ave  
Hbg PA 17112

2559

*Brenda's Barkin Basement*

440 Henry Rd  
Rossiter, PA 15772

RECEIVED

2007 FEB -8 AM 11:11

January 31, 2007

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

INDEPENDENT REGULATORY  
REVIEW COMMISSION

Dear Ms. Bender,

I am writing in opposition to the proposed changes to the Dog Law Act 225 which was issued on December 16, 2006. I completely understand that substandard kennel conditions should not be permitted, but most of the proposed regulatory changes are impractical and costly.

These proposals call for change in definitions and requirements of licensed and inspected kennels within the Commonwealth. These extensive changes must go through Pennsylvania's House and Senate legislative processes.

The proposed regulations call for the temperature of the kennel floor to be 50F° in the warm weather. Many kennels are air conditioned to a comfortable 70F°. A dog sleeping on a 50F° floor can develop hypothermia and become ill or die. For temperature, lighting, cleaning, exercise, housing, and veterinary care, the attending veterinarian should set forth and approve procedures specific for the kennel buildings and breeds of dogs.

Kennels have been custom built to comply with the Department of Agriculture's Dog Law Enforcement standards that were based on USDA standards. The proposed changes of this section will require the demolition of licensed and inspected kennels and the rebuilding of entirely new dimensioned kennels. The average cost per kennel will be between \$30,000.00 and \$500,000.00 each.

The proposed changes would require a substantial increase in manpower with many hours dedicated to filling out written bureaucratic reports and divert the small business owner's time away from caring for their animals.

I sincerely urge that this proposal be rescinded and the USDA standard be adopted in Pennsylvania.

Sincerely,

*Brenda C Carl*

2559

Mahlon Brenneman  
706 Davis Rd  
Salisbury, PA 15558

RECEIVED

2007 FEB -8 AM 11:11

January 31, 2007

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

INDEPENDENT REGULATORY  
REVIEW COMMISSION

Dear Ms. Bender,

I am writing in opposition to the proposed changes to the Dog Law Act 225 which was issued on December 16, 2006. I completely understand that substandard kennel conditions should not be permitted, but most of the proposed regulatory changes are impractical and costly.

These proposals call for change in definitions and requirements of licensed and inspected kennels within the Commonwealth. These extensive changes must go through Pennsylvania's House and Senate legislative processes.

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The proposed changes would require a substantial increase in manpower with many hours dedicated to filling out written bureaucratic reports and divert the small business owner's time away from caring for their animals.

I sincerely urge that this proposal be rescinded and the USDA standard be adopted in Pennsylvania.

Sincerely,

*Mahlon Brenneman*



2559

David Branneman  
228 Coal Rd.  
Meyersdale, PA 15552

RECEIVED  
2007 FEB -8 AM 11:11

January 31, 2007

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

INDEPENDENT REGULATORY  
REVIEW COMMISSION

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The proposed changes would require a substantial increase in manpower with many hours dedicated to filling out written bureaucratic reports and divert the small business owner's time away from caring for their animals.

I sincerely urge that this proposal be rescinded and the USDA standard be adopted in Pennsylvania.

Sincerely,

*David B. Branneman*  
Arie B. Branneman

2559

**Bridget Rhoades**  
**41 Summer Mt. Road**  
**Bernville, PA 19506**

RECEIVED

2007 FEB -0 AM 11:14

INDEPENDENT REGULATORY  
REVIEW COMMISSION

January 18, 2007

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

Dear Ms. Bender,

I am writing in opposition to the proposed changes to the Dog Law Act 225 which was issued on December 16, 2006. I completely understand that substandard kennel conditions should not be permitted, but most of the proposed regulatory changes are impractical and costly.

These proposals call for change in definitions and requirements of licensed and inspected kennels within the Commonwealth. These extensive changes must go through Pennsylvania's House and Senate legislative processes.

The proposed regulations call for the temperature of the kennel floor to be 50F<sup>o</sup> in the warm weather. Many kennels are air conditioned to a comfortable 70F<sup>o</sup>. A dog sleeping on a 50F<sup>o</sup> floor can develop hypothermia and become ill or die. For temperature, lighting, cleaning, exercise, housing, and veterinary care, the attending veterinarian should set forth and approve procedures specific for the kennel buildings and breeds of dogs.

Kennels have been custom built to comply with the Department of Agriculture's Dog Law Enforcement standards that were based on USDA standards. The proposed changes of this section will require the demolition of licensed and inspected kennels and the rebuilding of entirely new dimensioned kennels. The average cost per kennel will be between \$30,000.00 and \$500,000.00 each.

The proposed changes would require a substantial increase in manpower with many hours dedicated to filling out written bureaucratic reports and divert the small business owner's time away from caring for their animals.

I sincerely urge that this proposal be rescinded and the USDA standard be adopted in Pennsylvania.

Sincerely,

BridgetARhoads

Bridget Rhoads

2559

*Dishong's Kennel*  
*1234 Flemming Summit Rd*  
*Commodore, PA 15729*

RECEIVED  
2007 FEB -8 AM 11:10

January 11, 2007

INDEPENDENT REGULATORY  
REVIEW COMMISSION

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

Dear Ms. Bender,

I am writing in opposition to the proposed changes to the Dog Law Act 225 which was issued on December 16, 2006. I completely understand that substandard kennel conditions should not be permitted, but most of the proposed regulatory changes are impractical and costly.

These proposals call for change in definitions and requirements of licensed and inspected kennels within the Commonwealth. These extensive changes must go through Pennsylvania's House and Senate legislative processes.

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The proposed changes would require a substantial increase in manpower with many hours dedicated to filling out written bureaucratic reports and divert the small business owner's time away from caring for their animals.

I sincerely urge that this proposal be rescinded and the USDA standard be adopted in Pennsylvania.

Sincerely,

*Tom + Debbie Dishong*

2559

Brookside Kennel  
5921 Plank Rd  
Narvon, PA 17555

RECEIVED

2007 FEB -8 AM 11: 11

INDEPENDENT REGULATORY  
REVIEW COMMISSION

January 31, 2007

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

Dear Ms. Bender,

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These proposals call for change in definitions and requirements of licensed and inspected kennels within the Commonwealth. These extensive changes must go through Pennsylvania's House and Senate legislative processes.

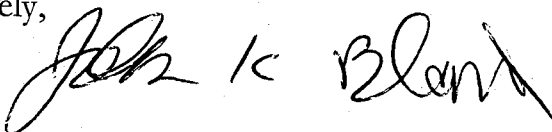
The proposed regulations call for the temperature of the kennel floor to be 50F° in the warm weather. Many kennels are air conditioned to a comfortable 70F°. A dog sleeping on a 50F° floor can develop hypothermia and become ill or die. For temperature, lighting, cleaning, exercise, housing, and veterinary care, the attending veterinarian should set forth and approve procedures specific for the kennel buildings and breeds of dogs.

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The proposed changes would require a substantial increase in manpower with many hours dedicated to filling out written bureaucratic reports and divert the small business owner's time away from caring for their animals.

I sincerely urge that this proposal be rescinded and the USDA standard be adopted in Pennsylvania.

Sincerely,



2559

Eli Brenneman, Jr.  
706 Davis Rd  
Salisbury, PA 15558

RECEIVED

2007 FEB -8 AM 11:11

January 31, 2007

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

INDEPENDENT REGULATORY  
REVIEW COMMISSION

Dear Ms. Bender,

I am writing in opposition to the proposed changes to the Dog Law Act 225 which was issued on December 16, 2006. I completely understand that substandard kennel conditions should not be permitted, but most of the proposed regulatory changes are impractical and costly.

These proposals call for change in definitions and requirements of licensed and inspected kennels within the Commonwealth. These extensive changes must go through Pennsylvania's House and Senate legislative processes.

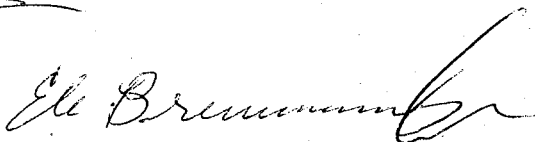
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Kennels have been custom built to comply with the Department of Agriculture's Dog Law Enforcement standards that were based on USDA standards. The proposed changes of this section will require the demolition of licensed and inspected kennels and the rebuilding of entirely new dimensioned kennels. The average cost per kennel will be between \$30,000.00 and \$500,000.00 each.

The proposed changes would require a substantial increase in manpower with many hours dedicated to filling out written bureaucratic reports and divert the small business owner's time away from caring for their animals.

I sincerely urge that this proposal be rescinded and the USDA standard be adopted in Pennsylvania.

Sincerely,



2559

Josh Kanagy  
400 S. Dryhouse Rd  
Belleville, PA 17004

RECEIVED

2007 FEB -8 AM 11:11

INDEPENDENT REGULATORY  
REVIEW COMMISSION

January 20, 2007

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

Dear Ms. Bender,

I am writing in response to oppose the Dog Law Regulations Act 225 recently issued on December 16, 2006. The current regulatory proposals in general are unenforceable and extremely onerous when put into practice.

The proposed regulations call for kennels to be specific in regard to exercise and cleaning records. These would require a substantial increase in manpower and time dedicated to filling out written bureaucratic reports, and it would be impossible to verify their accuracy. This change would also divert the small business owner's time away from caring for their animals.

The bureau already requires the name, address, acquisition date, disposition date, type of sale, breed, sex, color, whelping date, and identification number be recorded for each and every dog sold, transferred, adopted, or given away. If the department wishes to enforce the law, they already have all information needed.

Unless the kennel has purchased, sold, or transferred more than 26 dogs in a calendar year to the individual, it is impossible for the kennel to know if the individual is required to have a Pennsylvania kennel license.

Additionally, kennels have been custom built to comply with the Department of Agriculture's Dog Law Enforcement standards that were based on USDA standards. The proposed changes of this section will require the demolition of licensed and inspected kennels and the rebuilding of entirely new dimensioned kennels. The average cost per kennel will be between \$30,000.00 and \$500,000.00 each.

I sincerely urge that this proposal be rescinded and the USDA standard be adopted in Pennsylvania.

Yours Sincerely,

Josh Kanagy

Mary A. Kanagy

Deroy Kanagy

2559

RECEIVED

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

2007 FEB -8 AM 11:11

INDEPENDENT REGULATORY  
REVIEW COMMISSION

January 19, 2007

Dear Ms. Bender,

I am writing to comment on the proposed amendments to the Dog Law Regulations Act 225 issued on December 16, 2006. I personally think that many of the changes are impractical and burdensome, and will not improve the quality of life for dogs in kennels.

The proposed regulations will require a substantial increase in manpower with many hours dedicated to filling out bureaucratic reports or recordkeeping which the department already has.

Kennels have been custom built to comply with Pennsylvania Department of Agriculture's Dog Law Enforcement standards that were based on USDA Standards. The proposed changes of this section will require the demolition of Pennsylvania's licensed and inspected kennels and the rebuilding of entirely new dimensioned kennels. There is no scientific basis for the change; the average cost per kennel will be between \$30,000.00 and \$500,000.00 each.

The current proposed appears to be over idealistic in term of improving the welfare of dogs. I urge that this proposal be rescinded and an approach similar to the USDA standards be developed.

Yours truly,

*Katie C Peachey*  
3520 East Back mtn. Rd  
Bellefonte, PA

12004

2559

**Knowlton's Dog Obedience**  
**2317 Charleston Rd**  
**Wellsboro, PA 16901**

RECEIVED  
2007 FEB -8 AM 11:11

INDEPENDENT REGULATORY  
REVIEW COMMISSION

January 26, 2007

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

Dear Ms. Bender,

I am writing in response to oppose the Dog Law Regulations Act 225 recently issued on December 16, 2006. The current regulatory proposals in general are unenforceable and extremely onerous when put into practice.

The proposed regulations call for kennels to be specific in regard to exercise and cleaning records. These would require a substantial increase in manpower and time dedicated to filling out written bureaucratic reports, and it would be impossible to verify their accuracy. This change would also divert the small business owner's time away from caring for their animals.

The bureau already requires the name, address, acquisition date, disposition date, type of sale, breed, sex, color, whelping date, and identification number be recorded for each and every dog sold, transferred, adopted, or given away. If the department wishes to enforce the law, they already have all information needed.

Unless the kennel has purchased, sold, or transferred more than 26 dogs in a calendar year to the individual, it is impossible for the kennel to know if the individual is required to have a Pennsylvania kennel license.

Additionally, kennels have been custom built to comply with the Department of Agriculture's Dog Law Enforcement standards that were based on USDA standards. The proposed changes of this section will require the demolition of licensed and inspected kennels and the rebuilding of entirely new dimensioned kennels. The average cost per kennel will be between \$30,000.00 and \$500,000.00 each.

I sincerely urge that this proposal be rescinded and the USDA standard be adopted in Pennsylvania.

Yours Sincerely,

*Cynthia Knowlton*



2559

*Brookside Kennels  
2319 Brookside Road  
Bloomsburg, PA 17815*

RECEIVED

2007 FEB -8 AM 11:14

INDEPENDENT REGULATORY  
REVIEW COMMISSION

January 31, 2007

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

Dear Ms. Bender,

I am writing in opposition to the proposed changes to the Dog Law Act 225 which was issued on December 16, 2006. I completely understand that substandard kennel conditions should not be permitted, but most of the proposed regulatory changes are impractical and costly.

These proposals call for change in definitions and requirements of licensed and inspected kennels within the Commonwealth. These extensive changes must go through Pennsylvania's House and Senate legislative processes.

The proposed regulations call for the temperature of the kennel floor to be 50F° in the warm weather. Many kennels are air conditioned to a comfortable 70F°. A dog sleeping on a 50F° floor can develop hypothermia and become ill or die. For temperature, lighting, cleaning, exercise, housing, and veterinary care, the attending veterinarian should set forth and approve procedures specific for the kennel buildings and breeds of dogs.

Kennels have been custom built to comply with the Department of Agriculture's Dog Law Enforcement standards that were based on USDA standards. The proposed changes of this section will require the demolition of licensed and inspected kennels and the rebuilding of entirely new dimensioned kennels. The average cost per kennel will be between \$30,000.00 and \$500,000.00 each.

The proposed changes would require a substantial increase in manpower with many hours dedicated to filling out written bureaucratic reports and divert the small business owner's time away from caring for their animals.

I sincerely urge that this proposal be rescinded and the USDA standard be adopted in Pennsylvania.

Sincerely,

*Linda O'Keefe*

2559

**Kathy Ayers**  
**RR 1 Box 547**  
**Ulster, PA 18850**

RECEIVED

2007 FEB -8 AM 11:14

INDEPENDENT REGULATORY  
REVIEW COMMISSION

January 22, 2007

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

Dear Ms. Bender,

I am writing in opposition to the proposed changes to the Dog Law Act 225 which was issued on December 16, 2006. I completely understand that substandard kennel conditions should not be permitted, but most of the proposed regulatory changes are impractical and costly.

These proposals call for change in definitions and requirements of licensed and inspected kennels within the Commonwealth. These extensive changes must go through Pennsylvania's House and Senate legislative processes.

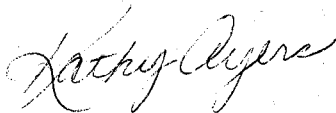
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The proposed changes would require a substantial increase in manpower with many hours dedicated to filling out written bureaucratic reports and divert the small business owner's time away from caring for their animals.

I sincerely urge that this proposal be rescinded and the USDA standard be adopted in Pennsylvania.

Sincerely,



2559

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

RECEIVED

2007 FEB -8 AM 11:12

INDEPENDENT REGULATORY  
REVIEW COMMISSION

Dear Ms. Bender:

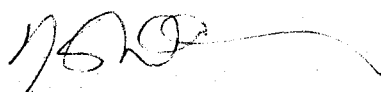
I am writing to comment on the proposed amendments to the Pennsylvania dog law regulations issued on December 16, 2006. I believe that inhumane and substandard kennel conditions should not be tolerated, but I do not agree that most of the proposed regulatory changes are needed, or would necessarily have a beneficial outcome if adopted. Many are impractical, excessively burdensome and costly, unenforceable, and/or will not improve the quality of life for the dogs in these kennels.

- \* The definition of "temporary housing" would require thousands of small residential hobby and show breeding households to become licensed which could not possibly comply with the regulations, and which there is no reason to regulate.
- \* The obligations of owners of "temporary housing" which are made subject to inspection by the proposal are not enumerated or limited.
- \* There is no scientific or accepted husbandry basis for the amended space and exercise requirements.
- \* The regulations will require wholesale renovation, if not rebuilding, of many kennels already built in compliance with current federal and/or state standards. There is no scientific foundation for the arbitrary, rigid engineering standards specified.
- \* Smaller breeders and dog owners who maintain their dogs in their own residential premises but are covered by the Pennsylvania dog law, who provide care and conditions far superior to those required by the proposed new standards, would be unable to comply with the rigid commercial kennel standards.
- \* The record keeping requirements with respect to exercise, cleaning, and other aspects of kennel management are excessively burdensome and serve no useful purpose, as it would be impossible to verify their accuracy in all but the most egregious circumstances. Such egregious circumstances already violate existing regulations.
- \* The proposals pertaining to housing and social interaction of dogs of different sizes are contrary to good husbandry, socialization and training practices.

The above is far from a complete list of the deficiencies with the proposed regulations. I also associate myself with the more detailed comments on this proposal by the Pennsylvania Federation of Dog Clubs.

The Bureau has tacitly conceded that its current regulations have not been adequately enforced. If, after implementing its recently announced enhanced enforcement program, the Bureau finds it is still unable to prevent inhumane treatment of dogs because of specific deficiencies in the existing regulations, it should cite these specific deficiencies and propose changes based on them. The current proposal appears to be merely a laundry list of ideas for improving the environment for dogs that has no connection to specific instances in which the welfare of dogs could not be secured and no basis in science or accepted canine husbandry practices. I urge that this proposal be withdrawn.

Sincerely,

  
Kristeen J Davidson Christman  
16 Hartzell Ave  
Telford PA 18969

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

RECEIVED

7:27 FEB -8 AM 11:12

INDEPENDENT REGULATORY  
REVIEW COMMISSION

Dear Ms. Bender:

I am writing to comment on the proposed amendments to the Pennsylvania dog law regulations issued on December 16, 2006. I believe that inhumane and substandard kennel conditions should not be tolerated, but I do not agree that most of the proposed regulatory changes are needed, or would necessarily have a beneficial outcome if adopted. Many are impractical, excessively burdensome and costly, unenforceable, and/or will not improve the quality of life for the dogs in these kennels.

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Sincerely,

Nancy R. Wolmer  
 464 OSTRUM ST  
 BETHLEHEM, PA 18015

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

RECEIVED

2007 FEB -8 AM 11:12

INDEPENDENT REGULATORY  
REVIEW COMMISSION

Dear Ms. Bender:

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- \* The record keeping requirements with respect to exercise, cleaning, and other aspects of kennel management are excessively burdensome and serve no useful purpose, as it would be impossible to verify their accuracy in all but the most egregious circumstances. Such egregious circumstances already violate existing regulations.
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Sincerely,

*Mary Ann Hunsicker*  
 3009 W. Front St  
 Whitehall Pa 18052

2559

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

RECEIVED

2007 FEB -8 AM 11:14

INDEPENDENT REGULATORY  
REVIEW COMMISSION

Dear Ms. Bender:

I am writing to comment on the proposed amendments to the Pennsylvania dog law regulations issued on December 16, 2006. I believe that inhumane and substandard kennel conditions should not be tolerated, but I do not agree that most of the proposed regulatory changes are needed, or would necessarily have a beneficial outcome if adopted. Many are impractical, excessively burdensome and costly, unenforceable, and/or will not improve the quality of life for the dogs in these kennels.

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Sincerely,

Judy Walter  
1612 33RD St SW  
Allentown Pa 18103

2559

RECEIVED

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

2007 FEB -8 AM 11:14

INDEPENDENT REGULATORY  
REVIEW COMMISSION

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Sincerely,

*S. S. Bando*  
2949 Stone, Ck Rd  
L. Meritt, PA 19401  
1

2559

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

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2007 FEB -8 AM 11:13

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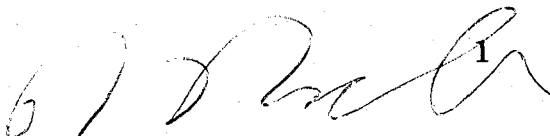
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Sincerely,

Rhonda Pochinski  
1059 S 25<sup>th</sup> St  
Easton Pa 18042





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

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Sincerely,

*Jeffrey J. Bulman*  
 1235 FRITZMAN  
 HARRISBURG PA 17106-2

2559

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

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Sincerely,

Edward S. Dzikowski  
124 S 5TH AVE  
COATESVILLE, PA 19320

2559

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Attn: Ms. Mary Bender  
Pennsylvania Department of Agriculture  
2301 North Cameron Street  
Harrisburg, PA 17110-9408

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Sincerely,

*Kimberly D. O'Neil*  
422 Main St. Apt 25  
Harrisburg PA 17101-1338

2559

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

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Sincerely,

Marybeth Mumford  
P.O. Box 275  
Lake Como, PA

18437

2559

RECEIVED

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

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Sincerely,

Robin MK@ptd.net

Robert M. Manna  
631 Prospect Ave  
Bethlehem PA 18018

RECEIVED

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 Attn: Ms. Mary Bender  
 Pennsylvania Department of Agriculture  
 2301 North Cameron Street  
 Harrisburg, PA 17110-9408

2007 FEB -8 AM 11:12

INDEPENDENT REGULATORY  
REVIEW COMMISSION

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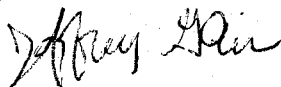
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Sincerely,



3460 Norwood Place  
 Holland PA 18966

2559

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Attn: Ms. Mary Bender  
Pennsylvania Department of Agriculture  
2301 North Cameron Street  
Harrisburg, PA 17110-9408

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Sincerely,

*Lon Shaffer*

~~231~~ *Call*

40 Black-Eyed-Susan  
Langhorne PA 19047

2559

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

RECEIVED

2007 FEB -8 AM 11:11

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Sincerely,

Nancy Cook  
Secretary - Airedale Terrier Club of  
Greater Philadelphia  
720 Ciderbrook Rd,  
Hockessin, DE 19707



2559

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

RECEIVED

2007 FEB -8 AM 11:10

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 2301 North Cameron Street  
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REVIEW COMMISSION

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- \* The record keeping requirements with respect to exercise, cleaning, and other aspects of kennel management are excessively burdensome and serve no useful purpose, as it would be impossible to verify their accuracy in all but the most egregious circumstances. Such egregious circumstances already violate existing regulations.
- \* The proposals pertaining to housing and social interaction of dogs of different sizes are contrary to good husbandry, socialization and training practices.

The above is far from a complete list of the deficiencies with the proposed regulations. I also associate myself with the more detailed comments on this proposal by the Pennsylvania Federation of Dog Clubs.

The Bureau has tacitly conceded that its current regulations have not been adequately enforced. If, after implementing its recently announced enhanced enforcement program, the Bureau finds it is still unable to prevent inhumane treatment of dogs because of specific deficiencies in the existing regulations, it should cite these specific deficiencies and propose changes based on them. The current proposal appears to be merely a laundry list of ideas for improving the environment for dogs that has no connection to specific instances in which the welfare of dogs could not be secured and no basis in science or accepted canine husbandry practices. I urge that this proposal be withdrawn.

Sincerely,

Nancy Eastenday  
 622 Washington Ave  
 Northampton, PA 18067

2559

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

RECEIVED

2007 FEB -8 AM 11:13

INDEPENDENT REGULATORY  
REVIEW COMMISSION

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Sincerely,

*Randy Carter*  
622 WASHINGTON AVE  
NORTHINGTON PA  
15067

2559

RECEIVED

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

2007 FEB -8 AM 11:14

INDEPENDENT REGULATORY  
REVIEW COMMISSION

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Sincerely,

*Walter Guelman*  
1238 Fritch Dr.  
Macungie PA 18062

2559

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

RECEIVED  
RECEIVED  
2007 FEB -8 AM 11:15  
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INDEPENDENT REGULATORY  
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REVIEW COMMISSION

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Sincerely,

Mary Ann DeKardos  
514 King Hill Road  
Starrucca PA 18462

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

RECEIVED

2007 FEB -8 AM 11:13

INDEPENDENT REGULATORY  
RENEW COMMISSION

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Sincerely,

*Victoria L. Cohen*  
 148 S. 3rd St  
 Quakertown PA  
 18951

2559

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

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Sincerely,

C. Diane Williams  
3459 Norwood  
Holland Pa 18906

2559

RECEIVED

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

2007 FEB -8 AM 11:13

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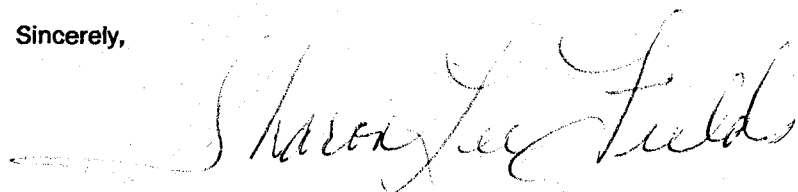
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Sincerely,



P.O. Box 348  
Bowmanstown, Pa  
18030



2559

Merlyn Kennels  
4209 Steubenville Pike  
Pittsburgh, PA 15205

RECEIVED

2007 FEB -8 AM 11:11

January 23, 2007

INDEPENDENT REGULATORY  
REVIEW COMMISSION

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

Dear Ms. Bender,

I am writing in response to the proposed amendments to the Dog Law Act 225 which was issued on December 16, 2006.

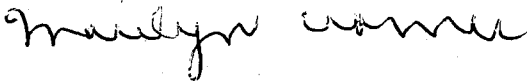
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The proposed record keeping would require me to write down the date and time I washed each food and water bowl, every time a pen is cleaned; each individual outside run is cleaned, etc. It would be better for me to have my general daily procedures that I routinely follow, in writing. This is similar to how the USDA regulations are worded.

The proposed changes would also require the demolition of Pennsylvania's licensed and inspected kennels. Yet, there is no scientific basis for the change. In addition, the average cost to rebuild kennel will be between \$30,000.00 and \$500,000.00 each.

I sincerely urge that this proposal be withdrawn, as the beneficial outcome will be in question if the proposal is adopted.

Yours truly,



2559

Nathan Myer  
170 W. Brubaker Valley Rd  
Lititz, PA 17543

RECEIVED

2007 FEB -8 AM 11: 11

INDEPENDENT REGULATORY  
REVIEW COMMISSION

January 26, 2007

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

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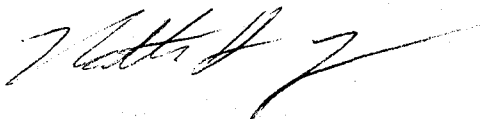
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2559

Myer Kennels Inc.  
170 W. Brubaker Valley Rd  
Lititz, PA 17543

January 26, 2007

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

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Yours truly,



RECEIVED

2007 FEB -8 AM 11:11

INDEPENDENT REGULATORY  
REVIEW COMMISSION

2559

Mountain View Kennels  
Rd 2 Box 336K  
Williamsburg, PA 16693

RECEIVED

2007 FEB -8 AM 11: 12

January 26, 2007

INDEPENDENT REGULATORY  
REVIEW COMMISSION

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

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Yours truly,



*owner*

Bureau of Dog Law Enforcement  
Attn: Ms Mary Bender  
Pennsylvania Department of Agriculture  
2301 North Cameron Street  
Harrisburg, PA 171109408

Dear Ms Bender:

I am writing to you because I am concerned with the proposed amendments to the Pennsylvania Dog Law Regulations issued on December 16, 2006. I believe that proper regulation of kennels is necessary but I question the extent to which these laws go.

As a pet owner who uses boarding kennels I question the effects of this law on the current boarding kennels. How many kennels currently in business meet the requirements as listed? Would these new laws force the closure of smaller boarding facilities and a dramatic increase in the price of boarding my pets as other facilities spend a lot of money to meet the new building specifications? Would it also make it more difficult to find a boarding kennel if these new regulations force existing kennels to close?

Section 21.23 imposes extreme requirements as to space, exercising and record keeping..

The intense record keeping required here and in other parts of the act make it almost a full time job keeping up the paperwork. Wouldn't these requirements increase the need for personnel at a boarding facility, thereby increasing my costs? Is it really necessary to keep detailed accounts of every time a water dish is changed? Surely better use can be made of kennel personnel's time.

Section 21.23 also says that dogs of different size can not be exercised together. Currently if I have two dogs who live together they can be placed in the same run when boarded, if these two dogs are of different sizes this will no longer be possible. This will increase my expense as discounts are usually given if two dogs are boarded in the same run. If my dogs live together in my home why shouldn't they be allowed to be together when boarded? I would prefer they have the security of being together when separated from me.

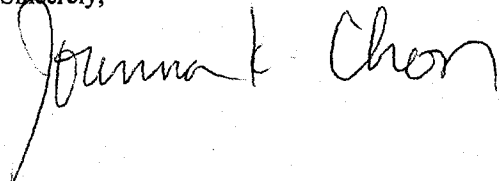
Under the proposed regulations pets who are boarded but of different size would not even be able to play together at the Kennel. Animals that live together in my home all the time and are comfortable together should be able to interact together if it is necessary to board them.

Section 21.28 says food receptacles cannot be made of materials that a dog can destroy. This precludes a kennel from using disposable paper containers to feed dogs. What could be more sanitary than containers which are not reused? The time spent cleaning metal food dishes is time staff can't use doing other things. The kennel where I now board uses paper for feeding boarders. I am very pleased with this.

I ask that these recommendations not be accepted and that the board seek the opinions of those who are actively involved in breeding and caring for dogs. How many people from such backgrounds were involved in the creation of these changes?

I urge the withdrawal of the current proposal and an open dialogue with the groups in the state that are actively involved in the breeding and care of dogs prior to any new proposals being introduced.

Sincerely,



Ms. Mary Bender  
Department of Agriculture  
Bureau of Dog Law Enforcement  
2301 North Cameron Street  
Harrisburg, PA 17110-9408  
February 5, 2007

RE: ID #2-152 (#2559)

Dear Ms Bender:

It has been brought to my attention that the Pennsylvania Dog Law regulations are undergoing revision and that you are soliciting public comment. I am writing to express strong opposition to the current revisions for a number of reasons. While it is admirable and desirable to address the issue of dog abuse and the deplorable conditions of puppy mills, the implementation of the proposed revised regulations (referenced above) would be likely to have nearly the opposite effect.

I sought out a reputable breeder when the time came for our family to add a puppy to our household. This breeder has a well-earned reputation for producing dogs that have achieved international awards, yet this same breeder would be forced to cease her contributions to the breed if these regulations go through. This can't be the intention of the writers of these regulations, yet that's the effect they would have.

Reputable breeders spend vast amounts of time and money in procuring and caring for dogs that are the most exemplary individuals of their breed. While these are often show dogs, receiving training and conditioning and nutrition and health care of the highest order, at the same time these dogs are also companions who share the breeders' home. Under the proposed rules, these loved family members would be required to be housed in nearly industrial conditions. That is probably one of the most unacceptable aspects of these regulations...they essentially condemn dogs to be kept as commercial livestock, without ever feeling the grass beneath their feet or getting to curl up on a couch or play with other dogs. The net effect would be a life of misery for most dogs, regardless of how warm and dry and clean they may be. The breeders who care most for their dogs would be forced out of breeding and showing by the exorbitant costs of compliance with these regulations, leaving the dog-loving public little recourse but to shop for puppies at pet stores, which in turn procure their pups from puppy mills and commercial 'growers' who care nothing for the happiness or welfare of their dogs, regarding them only as commodities capable of generating a profit.

These regulations don't stop with breeders. Boarding kennel operators, groomers, rescue leagues, trainers, veterinarians, search & rescue teams...anyone who cares for more than a handful of dogs would come under the reach of this dangerous precedent. The impact on the economy can't be underestimated; we are a dog-loving culture and the collapse of the small businesses that support the care of our beloved pets would reverberate throughout the Commonwealth.

In an effort to better the conditions for the dogs of our state, much could be accomplished by funding more Dog Law inspectors, more frequent inspections, and expanded education of the public in order to help buyers to locate reputable breeders whose dogs aren't mass-produced with profit as the only incentive to breeding. I appeal to you to rescind these changes.

Sincerely,

Frances A. Ferreroni

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

February 2, 2007

RE: Comments on proposed Dog Law regulations

Dear Ms. Bender,

As a concerned citizen of the state of Pennsylvania, I respectfully submit this comment on the proposed changes to the Dog Law regulations.

First, I would like to commend the Department of Agriculture and the Bureau of Dog Law Enforcement for proposing amendments to the Dog Law Regulations to improve conditions for dogs housed and bred in commercial breeding operations in Pennsylvania. **It should also be noted that the proposed changes to the regulations do not bring hobby breeders under the Act. The same people who were exempt from the former regulations (i.e. hobby breeders who raise, breed, move, sell, etc. fewer than 26 dogs per year), will continue to be exempt under the revised regulations.**

Furthermore, I fully support the comments submitted by the American Society for the Prevention of Cruelty to Animals (ASPCA) on behalf of its members, and incorporate them herein by reference. Specifically, I strongly support the following:

1. The penalties in § 21.4(1)(iii) for "failure of an individual to comply with licensure provisions" should be increased from \$25 to \$300 per violation to \$25 to \$300 *per day of violation*.
2. The Secretary should be mandating to file suit to enjoin operation of unlicensed kennels where the kennel is not in compliance with the standards in the regulations and is unable to qualify for a license.
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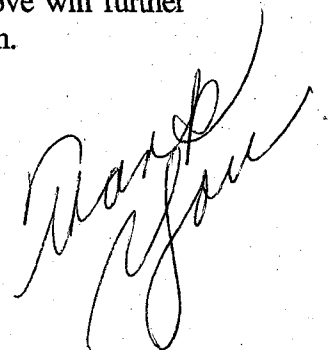
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Mary Bender  
Pa. Dept of Agriculture  
2301 North Cameron St  
Harrisburg, Pa 17110

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*Charles W. Christopher*

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

February 2, 2007

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A handwritten signature in cursive script, reading "Sheila A. Eno". The signature is written in dark ink on a white background.

Bureau of Dog Law Enforcement  
Pennsylvania Department of Agriculture  
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Pa. Dept of Agriculture  
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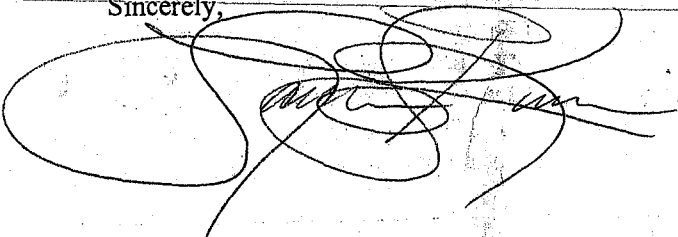
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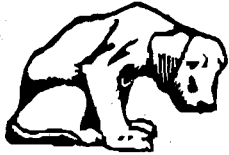
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Sincerely,

*Warren J. Risk*



# Prisoners of Greed Puppymills Breed Misery

Commercial Kennels

Facts

Examples

Summary

Auctions

Brokers

Meet the Dogs

USDA

PA Kennels

Kennel Survey

How to Buy a Dog

What You Can Do

Join the Coalition

Download

Billboards

Pet Store Protests

Protect a Pet Store

Pet Store Lawsuits

Newspaper Ads

Editorials

Survey

Compassionate Vet

Contribute

Shop

## Dogs Can't Talk -They Need You To Speak For Them

Please Send A Fax to the Director of Dog Law Bureau and the Independent Regulatory Review Commission

1. Copy the sample letter and paste it into a software program like Word. You can use it as it is written but it would be much better if you modified it to fit your opinion. Unique letters are better than standard letters but it's important that they get the message. If you are a vet or a vet tech, please add that. If you work for a rescue organization or have puppy mill dogs in your home, please add that.

2. Be sure to sign your name. Faxes/letters must be signed or they will be ignored.

3. Fax the letter. See the fax numbers below.

### Sample Letter

Dog Law Bureau Director, Independent Regulatory Review Commission:

I support the changes to the commercial dog regulations submitted by the Coalition Against Misery. The proposed regulations by the Pennsylvania Department of Agriculture that were recently published in the Pennsylvania Bulletin do not adequately address the issues of temperature control, cage conditions and humane breeding practices.

I am strongly opposed to commercial breeding kennels where the costs are minimized by providing substandard care and conditions for the dogs in an effort to increase the profit. I am writing to request that you immediately take steps to address the horrific conditions in commercial kennels in Pennsylvania. Every kennel must be required to have a visible, safe source of heat and air-conditioning. Additionally, the regulations should limit the number of dogs that are kept in a cage. And finally, we ask that you include breeding regulations consistent with those established by reputable breed clubs.

It is a profound embarrassment that Pennsylvania is known as the Puppy Mill Capital of the East Coast. Please take steps to ensure that the new regulations provide humane conditions for the dogs. Thank you.

### Fax Numbers

Dog Law Bureau Director Mary Bender 717.772.4352

Independent Regulatory Review Commission 717.783.2664

Michael R. Fore  
15547 23rd Pl. N  
Maple Grove MN 55311  
763 420 3731

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

February 2, 2007

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4. I also commend the Department of Agriculture and Bureau of Dog Law Enforcement for including a provision that requires the dog wardens to visually observe the physical condition of each dog. However, the provisions regarding orders of veterinary care should be strengthened to state that the owner must provide "proof of *current and proper* veterinary care for the dog." This provision should also be amended to include excessive matting and excessively long toenails as indications of lack of proper veterinary care. Inadequate grooming can lead to painful medical issues for dogs, including skin lesions from excessive matting and leg and joint injuries from failure to keep toenails appropriately trimmed. Moreover, the section should be amended to *require* dog wardens to order a veterinary check on dogs that exhibit signs of infection, contagious disease or parasite; or that appear to be in poor health where proof of current and proper veterinary care is not provided.

5. A new subsection should be added to § 21.30 clarifying the required training for dog wardens. Training in the following areas should be added into the regulations to expand upon the requirements set forth in 3 P.S. § 459-901:

1. State laws relating to dog licensing, control and owner responsibilities;
2. State and federal laws relating to animal care, cruelty and neglect;
3. State laws relating to dangerous dogs;
4. State and federal law relating to lack of arrest powers, proper use of search, seizure and warrants;
5. State and federal laws relating to pounds and shelters;
6. Basics of cruelty and neglect investigations for referral to appropriate authorities;
7. Report-writing and record-keeping;
8. Overview of the legal system, court structure and terminology;
9. Basics of interpreting animal behavior;
10. Identification of injury, disease, abuse and neglect in dogs;
11. Animal hoarders; and
12. Civil liability issues.

6. A new section should be added to the regulations mandating that the Department and dog wardens coordinate and work with law enforcement when applicable. It is imperative that the department work with law enforcement, and specifically Humane Society police officers, to ensure that both the cruelty laws and the Dog Law are adequately enforced.

7. A new section should be added to the regulations requiring that a licensee must have enough employees to carry out the level of husbandry practices and care required by the Act and its regulations. Additionally, the employees who provide for care and husbandry or handle animals should be supervised by an individual who has the knowledge, background, and experience in proper husbandry and care of dogs to supervise others. The licensee must be certain that the supervisor and other employees can perform to such standards.

8. Stacking primary enclosures on top of one another should be prohibited. Stacking cages creates an unnatural environment for the dogs. Additionally, it makes observation of the dogs more difficult and creates sanitation problems. Even with a tray or partition between cages, it is likely that the partitions may overflow, causing feces, urine, food, water, and hair to fall onto the dogs located in the cages below.

9. The section on wire mesh flooring should be amended to make it at least as strict as the federal Animal Welfare Act, which requires that metal strand flooring be greater than one-eighth of an inch in diameter (9 gauge) or coated with a material such as plastic or fiberglass. Language should also be added requiring that all primary enclosures that have wire mesh flooring also have a resting board of sufficient size to allow each dog in the enclosure to lie in a full lateral recumbent position and be able to make normal postural adjustments. Resting boards are necessary to provide for the comfort of the dog and to allow the animal to have some time away from living on grated fencing. Providing resting boards will result in fewer foot lesions and other foot and leg injuries to the dogs. A solid resting surface that is impervious to moisture is also a more natural environment for the animal, provides a draft-free surface and enables the dog to retain its body heat. A dog feels most vulnerable when lying down, and forcing a dog to lie over an exposed area can contribute to anxiety. Humane standards and survival standards are separate, and creating an environment that merely allows for survival does not necessarily make such an environment humane.

10. Contrary to what the breeding industry states, the engineering standards specified in the proposed regulations do have a scientific foundation. The standards in the proposed regulations are more akin to acceptable husbandry practices. They will bring the engineering standards up to par with, if not above, those set forth in the Animal Welfare Act. Contrary to the hobby breeders' contention, the new regulations will not bring hobby breeders under the purview of the Dog Law. Only kennels that keep, harbor, board, shelter, sell, give away, or transfer a cumulative total of 26 or more dogs in one calendar year will be required to comply with the new regulations. As a result, true hobby breeders are still exempt from the law. Good husbandry practices dictate that anyone harboring a larger number of dogs (26 or more) should comply with certain engineering standards to ensure the health, safety, and well-being of the dogs. The Dog Law and its regulations are aimed at regulating larger and commercial breeding facilities. Therefore, the new regulations will not affect hobby breeders, contrary to what the breeding community suggests.

Once again, I commend the Department of Agriculture and the Bureau of Dog Law Enforcement for proposing regulations that will improve the conditions for dogs housed and bred in Pennsylvania's commercial kennels. The changes I have noted above will further ensure that such dogs are protected. Thank you for your time and consideration.

Sincerely,

Marcy J. Caf

P.S. Put these money hungry humans  
out of business.

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

February 2, 2007

RE: Comments on proposed Dog Law regulations

Dear Ms. Bender,

As a concerned citizen of the ~~state of Pennsylvania~~ <sup>United States of America</sup>, I respectfully submit this comment on the proposed changes to the Dog Law regulations.

First, I would like to commend the Department of Agriculture and the Bureau of Dog Law Enforcement for proposing amendments to the Dog Law Regulations to improve conditions for dogs housed and bred in commercial breeding operations in Pennsylvania. **It should also be noted that the proposed changes to the regulations do not bring hobby breeders under the Act. The same people who were exempt from the former regulations (i.e. hobby breeders who raise, breed, move, sell, etc. fewer than 26 dogs per year), will continue to be exempt under the revised regulations.**

Furthermore, I fully support the comments submitted by the American Society for the Prevention of Cruelty to Animals (ASPCA) on behalf of its members, and incorporate them herein by reference. Specifically, I strongly support the following:

1. The penalties in § 21.4(1)(iii) for "failure of an individual to comply with licensure provisions" should be increased from \$25 to \$300 per violation to \$25 to \$300 *per day of violation*.
2. The Secretary should be mandating to file suit to enjoin operation of unlicensed kennels where the kennel is not in compliance with the standards in the regulations and is unable to qualify for a license.
3. I commend the Department of Agriculture and the Bureau of Dog Law Enforcement for doubling the required cage size. This is perhaps the most important change that can be made to improve the quality of life for dogs in commercial breeding facilities in Pennsylvania. This provision should remain in the regulations regardless of opposition from breeders. This section should be further strengthened by adding a provision stating that where more than one dog is housed in a primary enclosure, the primary enclosure must provide adequate space for all dogs. For instance, if the enclosure houses two dogs, it must provide double the cage space that would be required for a single dog. If it houses three dogs, it must provide three times the cage space, etc.



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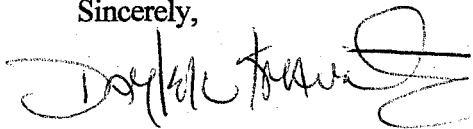
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Sincerely,

A handwritten signature in dark ink, appearing to read "Doyle J. Kline". The signature is fluid and cursive, with a large, stylized initial "D".