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March 13, 2007

MAR 20 REC'D

INDEPENDENT REGULATORY  
REVIEW COMMISSION

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

**RE: Proposed Amendments to the Pennsylvania Dog Law Regulation**

Dear Ms. Bender:

Over the past eight years since I moved to Harrisburg, I have served in various capacities as a volunteer for Susquehanna Service Dogs. I have fostered a service dog trainee. I have been an active puppy-sitter for families with trainees who are out of town. I have been a "puppy hugger" working to socialize new litters. In addition, I have two dogs of my own, one of whom I purchased in November from an incredible breeder in Erie. I am also an eager and enthusiastic supporter of the Delaware Valley Golden Retriever Rescue.

I am writing because of the proposed amendments to the Pennsylvania dog law regulations. Inhumane and substandard kennel conditions should not be tolerated. I have seen first-hand what those conditions can do. A close friend adopted a breeding bitch rescued from a puppy mill. Until Gracie arrived at Delaware Valley, she had never walked on grass or been the object of any affection. Gracie is now a lovable and happy family member. I recently had her in my home for two weeks and the adjustment she has made in two years is amazing.

However, I do not see these regulations as saving future Gracies and the many puppies that they provide. Rather, they will adversely affect the quality breeders like the one in Erie where I got my puppy. Many of the regulations are impractical, excessively burdensome and costly, unenforceable, and/or will not improve the quality of life for the dogs in these offensive kennels.

The following are a few of the problems I see with the proposed regulations:

1. The proposals pertaining to housing and social interaction of dogs of different sizes are contrary to good husbandry, socialization and training practices. I find the regulations in this regard most offensive. The reason I purchased my dog from the breeder I did was that she socialized her dogs and integrated them into her family and with the other dogs she has. My puppy is social and at ease with children and adults and other dogs. My adult dog, who

was bred in California by a similar breeder, has always been social and comfortable with people and animals. She is a registered therapy dog and is a real joy.

2. Smaller breeders and dog owners who provide care and conditions far superior to those required by the proposed new standards and who maintain their dogs in their own residential premises but are covered by the Pennsylvania dog law, would be unable to comply with the rigid commercial kennel standards.

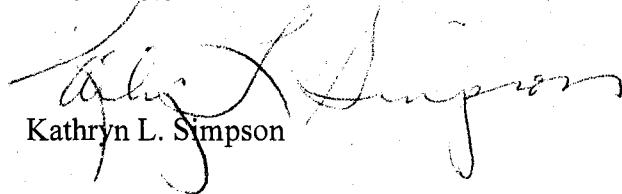
3. The regulations will require wholesale renovation, if not rebuilding, of many kennels already built in compliance with current federal and/or state standards. There is no scientific foundation for the arbitrary, rigid engineering standards specified.

4. 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.

This is far from a complete list of the deficiencies with the proposed regulations.

I think it is obvious that current regulations have not been enforced. The best place to start is to expend resources on enforcing the current law and regulations. If, after a period of stringent enforcement there remains a real problem, that would be the time to consider new regulations aimed at the real problem, and not those that will put responsible breeders out of business.

Very truly yours,



Kathryn L. Simpson

cc: Jennifer Craig  
Betsy Howell