

Town & Country Kennel Inc.

and Pet Care Center

John Jewett / Michael Stevens
 Independent Regulatory Review Commission
 333 Market Street 14th Floor
 Harrisburg, Pa. 17101

☛ Day Care

March 14, 2007

☛ Spa/Conditioning

Mr. John Jewett / Mr. Michael Stevens

☛ Grooming

Thou my position on the Dog Law Advisory Board is that of the Kennel Representative, I am concerned with the impact that these proposed changes will have on the entire pet industry as well as on the dogs that it is suppose to help and protect. I have been in the pet care field for over 40 years, and my husband designs and builds cat boarding facilities for other kennels. We understand the needs of the pet boarding kennel industry. In the absence of their owners, we in boarding kennels attempt to provide a suitable replace for their pet during that time.

☛ Boarding

We couldn't accomplish this with regulations that are formulated based on a Military or Police Manual. As I said before, we take care of the hairy children of our clients.

☛ Pet Shipping

☛ International Transport

Just as well, I feel sure that there are also many knowable and caring pet people in the many different services available in this state. There have been many beneficial changes over the recent years. But in spite of this I do realize that many more need to be made. During the recent changes I understand that many of the Wardens assisted Commercial Breeder Kennels, thus enabling them to be compliant with the current regulations. Wouldn't be more beneficial to continue in that direction? The kennels who are unlicensed should not be allowed to remain open.

☛ Pet Supplies

☛ On Site
 Buxmont
 Veterinary Hospital

Upon review of the new regulations my first thought was, what is this supposed to accomplish? Certainly not to improve the health and welfare of the dogs.

I'll start here:

The **drain** size of 6 inches is totally unnecessary, and in light of the previous statement, that all waste material must be removed by a **shovel?**, prior to the rinsing of the dogs run. That requirement is overkill and unnecessary. In our kennel the drains are 4 inches, and are more than adequate to accomplish our needs. They are large enough to quickly remove water, and any waste material.

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INDEPENDENT REGULATORY
 REVIEW COMMISSION



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Floor: "slab" temperature not less than 35o and or more than 55o. Neither temperature is acceptable. To keep a floor at only 3 degrees above freezing is cruel. Depending on the type of dog, 55 degrees is not adequate either. All floors in the animal areas at our facility have radiant heat. They are warm, so that even those elderly and arthritic dogs are comfortable. We can have frequent air exchanges in the kennel without compromising their comfort.

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Air Exchanges:

This, the radiant also removes the necessity of air movement at the floor level as an aid in drying the floors. That is taken care of by the radiant heat also. During an air exchange there is a loss of heat with that exchange. That loss is minimized because our heat is in the floor. At the level of the dog. Thou we prefer them, I do think that to require kennels to have heated floors is unnecessary. It is also not necessary to include those temperatures in the regulations.

Food Removal:

We try to keep our guest as close to their feeding schedule from home as possible. Many pet owners request that we leave their food dishes with the pet to allow enough time to eat. Some have dry food available 24 hours a day. We need to be able to accommodate the needs of the different individuals. As requested by their owners.

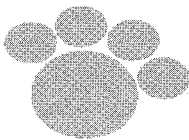
Sanitation

All bowels are removed, and washed at least twice daily, or more often as needed. Pets whose food is always available are replaced, with fresh bowels. Kennel enclosures are sanitized daily, and cleaned through out the day as often as necessary.

Record Keeping:

The requirement of paper documentation of kennel procedures and functions is excessive and redundant.

All client information, vaccine, feeding instructions, behavior patterns, bedding, activity schedules, housing, room number or kennel, cleaning instructions or precautions, date of entry and departure, emergency and their Veterinarians phone number. Everything that pertains to this client and their pet is stored in our computer data base. All of this information and more is available at our fingertips. Not buried in a box in storage.





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Exercising:

Most boarding kennels at this time do provide exercise programs for dogs. The dogs can interact with their handler. Some of the exercise programs are very creative. All of this is driven by the request and interest of the pet owner, and the boarding kennel owners desire to create a healthy positive experience for the dog. Boarding kennels do go beyond the basic requirements.

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I think the best way to describe these regulations are; that they were originally intended to address the problems with breeding facilities and were extended to include all pet care activity. When drafting a document such as this, there must be a consideration of the diversity of all pet services.

We as professionals in our field must be able to function effectively in the roles required of us. That would be extremely difficult as these changes are written.

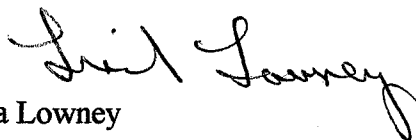
In the revisions or rewrite of these regulations participation from individuals in the various pet fields must be included.

That will produce regulations that will require and enable humane care and contain for all the pets in Pennsylvania in a manor that will not financially handicap all of those that are loving pet care people. This would further insure that those new regulations would not be harmful to the pets that we take care of from private homes. Those are the same Kennel people that are presently abiding by the current state laws and are inspected and licensed by the state.

My fear is that by the obsessive over regulation and with the heavy cost to comply with those changes, many individuals in the pet care field will be unable to remain licensed. This will cause owners to turn to untrained or unskilled, and unlicensed people to fill the void. This could be petsitters who are unlicensed by the state, are not regulated by the state, and may very well be working on a cash bases. This will benefit no one.

I work towards the health and welfare of pets in every aspect of what I do. I do apologize if at times it is hard not to become emotional.

Thank you for your time and consideration.



Linda Lowney