

2559

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2007 MAR 16 AM 9:35

2002 Wentworth Drive
Camp Hill, PA 17011-7447
March 15, 2007

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

INDEPENDENT REGULATORY
REVIEW COMMISSION

Dear Ms Bender,

I am writing to you today regarding the proposed changes to the kennel regulations as published in the PA Bulletin on December 16, 2006. Simply put, because these regulations were not drafted in good faith with the stakeholders and citizens of the Commonwealth of Pennsylvania, they should be summarily withdrawn.

When the Pennsylvania Dog Law (Act 225 of 1982, PL 784) was enacted it was one of the best in the nation. It was considered a model that many other states have used to draft their own laws regarding canines in our society. This Law was developed with a lot of input from many stakeholders, but not the least of which was the PA Federation of Dog Clubs. The PFDC may be considered by some to be a special interest group, but in reality it is a grass-roots organization that gives a voice to all the hobby breeders, trainers and rescuers of dogs in the Commonwealth. The overwhelming majority of the good people who are members of the clubs and organizations that make up the PFDC do not make their primary income from their activities with dogs. They give of their time, resources and knowledge to raise and train the best dogs they can because they love them. None of the leaders of these member organizations are paid, and none of the leaders of the PFDC itself are paid for their activities on behalf of these organizations. As a result of all this, the Legislature of Pennsylvania saw fit to create a seat on the Dog Law Advisory Board, created by Act 225, for "A representative of dog clubs". I think it is fair to say that if you check the record of debate on this legislation, the Legislators had the PFDC in mind for this seat.

The PA Federation of Dog Clubs was allowed by all the Governors and their Secretaries of Agriculture from 1982 until 2006 to send a representative to the Dog Law Advisory Board. As a part of the DLAB, the representative of the dog clubs and the hobby dog fanciers gave thoughtful input to many proposed changes the Dog Law and its supporting Kennel Regulations. A representative from the PFDC attended every meeting of the Dog Law Advisory Board. These meetings had to be called by the Secretary of Agriculture as directed by the Governor, so it is they who control the schedule of the meetings. To claim that the Dog Law Advisory Board and the representative from the PFDC were not doing enough to improve conditions in the Commonwealth's commercial kennels was an insult to all those who have served as representatives of breeders like me. Then, despite the fact that there is no mechanism in the Dog Law to allow the "firing" of the members of the Dog Law Advisory Board, barring their absense from 50% of the meetings, Governor Rendell further insulted the citizens of PA who are hobby breeders of dogs, by "firing" our representative and replacing them with someone who is completely unrelated to the PA Federation of Dog Clubs.

Prior to this publicity event, the late Dotsie Keith, Chairperson of the PFDC Legislative Committee, became aware of new kennel regulations being drafted, but this news came through unofficial sources. Notification as a member of the Dog Law Advisory Board that new regulations were being written was very late in coming. It may never have come at all to Ms Keith had those who respected her work not passed word to her. The same sources reported that an ad-hoc committee made up of representatives of so-called "anti-puppy-mill" organizations, representatives of the ASPCA and some legal professionals hand-picked by the Governor and his staff were writing the new regulations. As a member of the Dog Law Advisory Board and the Legislative Chairperson of the largest statewide dog organization, Dotsie Keith demanded a copy of these new regulations in the Spring of 2006. I believe because she knew of the existence of the draft regulations, because of her hard earned reputation in the Capitol on dog issues, and because of the reputation of the PFDC, she eventually prevailed in obtaining the draft regulations. This is should not have been necessary.

In summary, because these regulations were not developed in a public manner, because they were not developed with the input of all stakeholders in issue related to dogs, because the legally formed and acting Dog Law Advisory Board was ignored, and because some from outside the Commonwealth had more input then citizens of Pennsylvania, I demand that these regulations be completely wihdrawn. Continue your increased emphasis on enforcing current Law and Regulations, study where loop holes may exist and then start the entire process a new, in the light of day, with all PA stakeholders at the table. Thank you.

Sincerely,

Darin Cox

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Gelnett, Wanda B.

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From: Jewett, John H.
Sent: Friday, March 16, 2007 9:16 AM
To: Gelnett, Wanda B.; Stephens, Michael J.; Wilmarth, Fiona E.
Subject: FW: My personal letter on proposed kennel regulations

INDEPENDENT REGULATORY
REVIEW COMMISSION

Wanda:

Proposed comments for #2559

From: Darin Cox [mailto:darin.cox@paonline.com]
Sent: Fri 3/16/2007 9:11 AM
To: pvance@pasen.gov; JNailor@pahousegop.com; Jewett, John H.; elyon@patriot-news.com
Cc: OSAKANUC@aol.com; PASnider@hsh.org
Subject: My personal letter on proposed kennel regulations

Good Morning,

Attached is my personal letter regarding the proposed kennel regulations as published in the PA Bulletin on December 16, 2006.
Thank you.

Darin Cox,
WudaFace Kennels,
Joe, aka ValleyHill When the Nite Comes (English Cocker Spaniel)
Ch.U-CD,U-ACH Pip OA,OAJ,NAP,OJP,SH,RA,WDX (English Cocker Spaniel)
U-ACHX,U-CDX Roxie CDX,AX,MXJ,RA,CGC (English Springer Spaniel)
U-CD,U-ACH Mirage CD,NA,OAP,AJP,RA,VSPX,CGC,TDI (Chinese Shar-Pei)
U-CDX Bailey CD,TT,NA,NAJ,CGC (English Springer Spaniel)
<http://www.paonline.com/WudaFace>

3/16/2007