

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

INDEPENDENT REGULATION
 REVIEW COMMISSION

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Ms Bender,

I am writing to you on behalf of the Southeast Keystone Chinese Shar-Pei Club regarding the proposed kennel regulations that are now open for public comment. The SEKCSPC is a member club of the PA Federation of Dog Clubs, and we actively participate in the issues brought to our attention through this organization. We are writing today to ask that the current regulations be completely withdrawn and the entire process restarted from the beginning.

For more than 25 years the PA Federation of Dog Clubs has been the voice of the dog-related organizations of Pennsylvania. Dotsie Keith, the late Vice President of the PFDC and Chair of their Legislative Committee, is still widely known and highly respected in the halls of the PA Legislature and in most offices of the PA Government that deal with canine issues. She found out through personal contacts that the Governor had an ad-hoc committee working on new kennel regulations more than a year before these regulations were made public. Because this was being done behind closed door, without the input of many of the PA stakeholders of canine issues, we could only surmise that what resulted may be very distasteful to us. Armed with this knowledge, Ms Keith was able to obtain a draft of the regulations in June 2006, and our worst fears were confirmed.

Dotsie Keith and the others in the PA Federation of Dog Clubs leadership then sat down and wrote a thoughtful position statement regarding these proposed regulations. They began bringing these matters to the full delegate body of the PFDC and asking us to bring the matter before our individual clubs. The reaction by many members of our club and clubs like it has been quite consistent: These changes are not in the best interest of our members or the dogs we own.

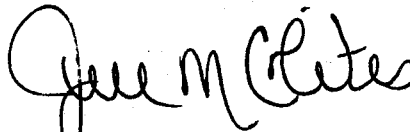
In August of 2006, Governor Rendell "fired" the Dog Law Advisory Board on which the PFDC has faithfully served since it was created in 1982. The Governor made statements in the press that the current DLAB had not done enough to address the problem of "puppy mills" in PA. This despite the fact that the Governor had not called more than three meetings of the DLAB during his administration. The profound disrespect shown by the Rendell Administration to all the contributions of time and knowledge by Dotsie Keith and the PA Federation of Dog Clubs on our behalf leads us to seek an apology from this Administration!

While we know many have commented on details of the proposal including the excessive record keeping requirements, the one-size-fits-all engineering requirements and the counterproductive socialization requirements, we would like to center our comments on the process that brought us to this point. It is our understanding that ASPCA and other organizations from outside the Commonwealth had more input to these regulations than did the PA Federation of Dog Clubs. We also understand that some groups rallying against so-called "puppy mills" and who have a decidedly pro-Animal-Rights viewpoint

had a significant input to their creation. It is obvious to us from reading them that the average citizen, dog owner and kennel operator of PA did not have much input to them.

Based on all of this and more, we call on the Bureau of Dog Law Enforcement, the Department of Agriculture and the Rendell Administration to immediately pull these regulations from consideration. We would then ask that previous Dog Law Advisory Board, that was far more balanced, be reinstated and the entire process of writing new regulations be started with a blank sheet of paper.

Sincerely,

A handwritten signature in black ink, appearing to read "Jill Clites". The signature is written in a cursive, flowing style with a large initial "J".

Jill Clites,
Secretary,

Southeast Keystone Chinese Shar-Pei Club