

Dear Ms. Bender, Dog Law Bureau Director, Independent Regulatory Review Commission:

This letter is in regards to the proposed amendments to the Pennsylvania Dog Law regulations at page page 7596 of the Pennsylvania Bulletin published on December 16, 2006 (Volume 36, Number 50). Thank you for extending the public comment period.

As a dog owner and customer of a Pennsylvania training kennel for field dogs, I do not approve of many of the steps recently taken by the Dog Law Advisory Board to update kennel regulations and DO NOT support changes to the commercial dog regulations as an all-encompassing approach to rectify the problems that exist in this state with puppy mills. The proposed regulations by the Pennsylvania Department of Agriculture are not practical for all kennel owners, most certainly not the legitimate ones run by honest, law abiding owners. Undoubtedly, there are kennel owners in Pennsylvania running substandard operations and these owners, without question, should be required to improve their kennels as per existing regulations or risk being shut down.

In particular, some of the proposed changes to the regulations that I find to be unreasonable are as follows:

The regulation that addresses daily exercise is baffling to me. It states that each dog and puppy must be individually exercised on a leash for 20 minutes a day and documented as such. Yet, allowing the dog to run free in yards at the facility for given periods of time or the time spent hunting and training them in the field would not meet this requirement?

Another portion of the proposed regulation that I find equally unreasonable, are the new record keeping requirements. For example, no fewer than six separate forms would have to be completed each day for each dog in a kennel. These include individual daily records for exercising, feeding and watering, sanitizing bowls, sanitizing the kennel, cleaning the kennel and cleaning houses. For a kennel containing 50 dogs, these individual forms would require completing 300 different forms every day.

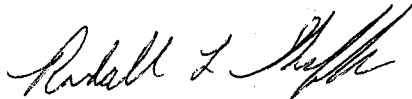
There's also the requirement to quarantine incoming dogs for a two week period? This would require additional kennel space that most successful facilities would not have. These are just of few of the concerns...

Ms. Bender, these regulations as proposed, will be dreadfully costly to the many quality breeders/kennel owners across the state. Compliance to these new requirements would in most cases, require additional personnel for the facility...totally impractical for the many operations that are operating on shoestring budgets. The kennel owners I have spoken to all agree the state's estimated costs for bringing their operations into compliance are extremely low. Many believe that the additional costs incurred to meet the requirements set forth in the new regulations will put them out of business, which in turn will create two very big problems. First, we would have the loss of jobs that this would create, and secondly, many of the hundreds of dogs that are currently in training kennels would become homeless. (Many customers of dogs in training kennels would not be prepared to take these dogs into their homes as house pets.)

There's also the loss of revenue for the state that this would create in the form of income generated from food, lodging, visits to tourist attractions, etc, as many customers make periodic visits to the training facilities from neighboring states to monitor the progress of their dogs. In my experience in this business, these customers often incorporate leisure time into their visits and stay for extended periods of time, bringing family and friends to take advantage of the many attractions Pennsylvania has to offer.

In closing, please continue your efforts to shut down puppy mills and any other kennel facility in our state where conditions exist that are detrimental to the health and safety of our canine companions. However, please consider this my input **AGAINST** the new proposed revision in the Pennsylvania Kennel Regulations.

Respectfully,



INDEPENDENT REGULATORY
REVIEW COMMISSION

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