March 15, 2007

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INDEPENDENT REGULATORY REVIEW COMMISSION

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

RE: Regulation ID # 2-152 (#2559)
Dog Law Regulations

Dear Ms. Bender:

I submit the following comments on the Proposed Amendments to the Pennsylvania Dog Law Regulations at Title 7 of the Pennsylvania Code.

Section 21.14 Kennel Licensure Provisions

(a)(3)(ii) This section would group kennels, commercial breeders, rescue organizations, and foster homes together and subject them to the same requirements.

1)I strongly object to rescue groups and foster homes being clumped under the same requirements as commercial breeders!! Why are they effected by your proposal? Because your proposal counts the dogs they take in as if the dogs were all being housed in one place...they are NOT...they are in foster homes across the state of PA in most every county!! NONE of their foster homes ever has more than 25 dogs in any one year...NONE!! Most foster homes house one to five foster dogs in any given year! The need for a state group is to give direction to the foster homes for the care of the dogs, funding the vetting of the dogs, buying supplies for the dogs' care (housetraining and socializing) and centralizing the adoption procedures for applicants and for home visits to be done...so that the dogs can be placed with the proper family, and won't end up back in the shelter system. The rescue groups take in owner turn ins, strays and those dogs given up by puppymillers when they have outlived their "usefulness" OR are ill or maimed in some way:(or dumped by the family who "bought" them because they aren't suitable in some way: (With your new regulations the rescue groups will be forced to close down. That will leave all the dogs they have serviced to go into the shelter system and result in many, many more dogs being euthanized due to lack of space. Is that what you are trying to accomplish? Please focus on the commercial breeders and do NOT go after the good guys! Rescue groups are run by volunteers and they are financed by donations...none of them are profitmaking operations! 2) I would also like to see Rescue Groups represented on the Dog Law Committee and also on the Advisory Board so their needs can have a voice!

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cc: Arthur Coccodrilli, Chairman Independent Regulatory Review Commission 333 Market Street, 14th Floor Harrisburg, PA 17101

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