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INDEPENDENT REGULATION  
REVIEW COMMISSION

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Dear Ms Bender,

I am writing in relation to the proposed changes to the regulation to Pennsylvania's Dog Law posted for public comment on December 16, 2006. While I support the Bureau's efforts to eliminate abusive dog breeding issues in the Commonwealth, a significant number of the provisions of the new rules are cause for concern. Many of these have been addressed by other correspondents however I wish to address one particular problem.

**Comment:** Housing provisions (Section 21.24) appear to prevent puppies in licensed kennels from being reared within a home. In this regard, the Bureau is locking all but the most insignificant dog breeders into a "commercial livestock rearing" model of canine husbandry. Licensing could be required for as few as two breeding bitches having two large litters in one calendar year. This is arguably hobby-level breeding.


Home rearing is the most appropriate environment for rearing puppies intended to live in a residence as a human companion. It permits habituation to stimuli in the domestic environment, helping ensure calm, non-destructive behavior in the home, and expedites housebreaking. This early training cannot be made up later in the dog's life.

The result of the proposed housing requirements would be reduced choice for Pennsylvania's puppy buyers, a significant number of whom do not want a kennel-reared dog. The proposed rules also militate against the pursuit of excellence by Pennsylvania's dog breeders trying to provide a high-quality human companion with minimal emotional and behavioral "baggage".

The proposed rules focus on the potential for infection at the expense of socialization issues, which are arguably as important. In fact, behavioral problems as perceived by owners are the main cause of death (by euthanasia, following abandonment) of dogs, not infectious disease.

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Overall, there are so many issues with the draft rules as promulgated I feel there would be benefit in withdrawing them and returning to discussion with stakeholders. Should this happen, it may save a lot of Departmental time and resources if a second round of consultation were more inclusive than the first.

  
David Steward.