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 INDEPENDENT REGULATORY
 REVIEW COMMISSION

To Whom It May Concern:

I am a retired show dog breeder. I no longer breed or show, but I am very concerned for the endurance of this hobby if the current proposed Amendments to the Dog Law are passed.

In particular, I wish to address: § 21.14. *Kennel licensure provisions* and § 21.22. *Housing*

All of these points sound valid to me to protect stock that is provided for by a commercial business and those animals currently housed with inadequate water and shelter by what is known to be Puppy Mills.

It is my belief that those who are categorized as Puppy Mills don't adhere to any current established laws, so how would the State be able to cull them since most are underground operations? Only by chance have a few been disclosed to us by the Media.

It is common knowledge, too, that these large scale commercial business as well as the Millers take no action in proper mating protocol...they churn out animals for profit, not for the betterment of the breed standard, statistically adding to the majority of abandoned and unwanted dogs left to fend for themselves or placed in PA shelters.

21.14. Kennel Licensure provisions

- (i) Upon reaching the cumulative total of 26 or more dogs of any age in any 1 calendar year, the establishment in question shall be required to apply for and obtain a kennel license. The establishment shall have ~~kennel facilities that meet the regulatory requirements~~ for all of the dogs currently on the premises or to be kept, harbored, boarded, sheltered, sold, given away or in any way transferred by the establishment, which ever number is larger.

The present proposed Amendments for Kennel Licensure provisions isn't just and shouldn't be applied to legitimate kennel club show breeders who maintain their dogs in a private residence and adhere to their local municipalities and current PA State laws, a majority of who also help place rescue dogs throughout the year. You will be putting the future of breeding sound, healthy canines in jeopardy as well flooding our SPCA's with unwanted dogs, since private breeders can't possibly adhere to the proposed "regulatory requirements."

§ 21.21. Dog quarters.

- (c) Adequate ~~drain in corners of both~~, shall be provided to rapidly eliminate excess water from both ~~indoor~~ and outdoor housing facilities and other areas such as outdoor runs and exercise areas.

As a fairly good example...currently, a well reputed and established PA licensed breeder could never accomplish compliance for what is proposed, nor be able to, within their local zoning laws. How could a drain be put in a home's kitchen floor?...Doesn't make sense to me as most of the articles, if applied to a home recognized breeder don't.

I could go on citing current Amendment points that simply can't be complied to regarding home-breeders, but you get my point.

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I leave it to you to find a way to differentiate between the commercial breeders/Puppy Mills and the legitimately PA licensed show breeder. **There HAS to be a delineation.**

Currently, there's a huge thrust in the media touting positive reasons to purchase pets from a "recognized breeder." One who understands their pedigrees and tries to eliminate what are known genetic problems within their lines. Those breeders support the new owners for the life of their pet. (This positive agenda is not offered by Commercial dog breeders and/or "Millers.") It's a long process to educate the public and by the time it finally sinks in, there will be no "true" breeders left for them to choose, if the proposed Amendments are enacted and enforced.

Also, I am distressed to find that the largest representation of breeders, The Pennsylvania Federation of Dog Clubs, has no representative on the newly established panel...is there a good reason for this? I would like an explanation of why they are no longer included.

Sincerely,



Lynn Bortman
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cc: Governor Ed Rendell