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Southampton, PA, 18966
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INDEPENDENT REGULATORY
REVIEW COMMISSION

Bureau of Dog Law Enforcement
Attn: Ms Mary Bender
Pennsylvania Department of Agriculture
2301 North Cameron Street
Harrisburg, PA 171109408

Dear Ms Bender:

I am a hobby breeder of Miniature Poodles. I am a board member of Greater Philadelphia Dog Fanciers and their AKC and PA Fed. of Dog Clubs Delegate. I am also a member of William Penn Poodle Club.

I am writing to you because I am concerned with the proposed amendments to the Pennsylvania Dog Law Regulations issued on December 16, 2006. I believe that proper regulation of kennels is necessary but I question the extent to which these laws go.

My first question is whether or not the problems with kennels in the state of Pennsylvania are really one of legislation or one of proper regulation? Would a concerted enforcement of the current laws help to defeat the inhumane substandard kennel conditions that currently exist in part of the state more effectively than the new regulations?

The current proposal would affect hobby breeders such as myself to the extent that many of us would no longer be able to breed. Fortunately my breed produces small litters but anyone with a large breed could easily exceed 26 dogs going through their household in the course of a year. Section 21.14 (3) would force a hobby breeder with a large breed to meet the extremely rigid standards proposed.

Most of us, hobby breeders, whelp our puppies in our homes and work very hard to see that our dogs are properly socialized and exposed to normal household noises and occurrences. This new law would force us to stop breeding or build expensive kennel facilities where we would not be able to expose our puppies to everyday experiences such as hearing a television, vacuum cleaner, telephone or other activities that our puppies would meet in their new homes.

The hobby breeder such as me spends a lot of time and effort seeing that our animals do not carry hereditary disorders that can be tested for. We put a lot of time and caring into the socializing of our puppies and seeing that they are placed in a good environment. The regulations as they now are proposed will cause many of us to stop breeding puppies and remove one of the best resources for puppies there is.

Section 21.23 imposes extreme requirements as to space, exercising and record keeping..

This section would force me to keep daily records of exercise provided to my dogs. The intense record keeping required here and in other parts of the act make it almost a full time job keeping up the paperwork. I would rather spend this time working with my dogs on socialization skills, grooming them and training.

Section 21.23 also says that dogs of different size can not be exercised together. When I had a Great Dane and miniature poodles they played together and were wonderful companions to each other. I firmly believe that the attention my minis gave my Dane when she was in congestive heart failure gave me more time with her. Under these new laws I wouldn't be able to let them enjoy this interaction.

If I still had my Great Dane and miniature poodles I would not be able to board them in a Kennel together under the proposed regulations. They would not even be able to play together at the Kennel. Animals that live together in my home all the time and are comfortable together should be able to interact together if it is necessary to board them.

As someone who occasionally boards their dogs in a Kennel I see many of these proposals as forcing excess work on the staff at the kennel and probably increasing my boarding costs. Section 21.28 says food receptacles cannot be made of materials that a dog can destroy. This precludes a kennel from using disposable paper containers to feed dogs. What could be more sanitary than containers which are not reused? The time spent cleaning metal food dishes is time staff can't use doing other things. The kennel where I now board uses paper for feeding boarders. I am very pleased with this.

The record keeping required of the kennel is extreme. Why does the state need to have records of when each water bowl was filled and sanitized as well as the time and date that food was provided? Can't a consumer or inspector judge without written records if this was done.

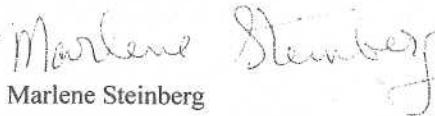
I would like to know the research that resulted in these proposals. Are the proposals intended to increase the welfare of dogs or make it more difficult to breed and own dogs?

I ask that these recommendations not be accepted and that the board seek the opinions of those who are actively involved in breeding and caring for dogs. How many people from such backgrounds were involved in the creation of these changes?

I also would like to know why there isn't a representative from the Pennsylvania Federation of Dog Clubs on the new advisory committee. The Federation represents thousands of small breeders in the state and has been a part of this committee since its inception. Why was it removed from representation on the new committee?

I urge the withdrawal of the current proposal and an open dialogue with the groups in the state that are actively involved in the breeding and care of dogs prior to any new proposals being introduced.

Sincerely,


Marlene Steinberg

Copies:
Representative Scott A. Petri
Senator Stewart J. Greeleaf
Pennsylvania Federation of Dog Clubs