

IRRC Attn James Smith

33 Market St. 14th Floor

Harrisburg PA 17101

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2010 AUG 16 A 10:42

Conodoguinee Creek Kennel
31 Quigley Road
Newburg PA 17240

Dear Jame Smith

My name is Michael S Kauffman Jr. and I am a PA Dealer licensee. I am very concerned about the Proposed Regulation. I feel that not only are these Proposed Regulations a unnecessary burden For all Comercial Kennels but also they are NOT For the welfare OF the Dogs. if they were then they would apply to any Kennel that houses Dogs like No Kill Shelters or Rescues. I was a Breeder For 15 years befor. becoming a Dealer and the things Required by these Regulations (Proposed) go way beyond From my expericnas is For the welfare OF the Dogs For example auxiliary ventilation

ventilation is Very important and we have used it For many years but 100 CFMs Per Dog housed therein would cause a unnecessary if not critical Draft For newborn PUPPIs

Humidity levels

what is ask For in appendix A would to me and My veterinarian's experience be very critical at ~~88~~ Degrees. (with 28% or less) Not to mention 91 Degrees with 6% that would dehydrate any newborn Puppy in that Primary Enclosure.

lighting

I feel that 12 hour OF 40 to 60 Foot Candles is way beyond what Nature intended and would Force many bitches to overextend there natural heat cycle.

Radiant heat Flooring

in order For Radiant heat Flooring to become harmful you would have to be circulating water over boiling point and circulators will not work properly. zoned flooring would be a safe alternative way. this is used in lots of home within the united states.

Flooring

Slatted Flooring with 1/2 in. and 3 1/2 in solid is allowed in act 119 but if the regulation it state that the dog toe or toenail to slip between any opening in the floor thereby causing injury. is that not going beyond the statute of act 119?

also Please note a quote that I heard at a Canine Health Board meeting was Quote (We do not need experience we need data) end Quote. we need and want Regulations but please I feel these are not for the welfare of the dog. I also realize PA did need a change within the Department of Dog law and the Kennels of PA needed more enforcement to better what we do. Keep in mind if we want to follow act 119 to the letter of the law any shelter or rescue that brings in a pregnant bitch weeps the puppies will be a commercial kennel.

Thank you For your time and considerations

Sincerely

Michael Heft