

Attachment N

Mr. Arthur Coccondrilli, Chairman
Independent Regulatory Review Commission
14th Floor, Harristown 2
333 Market Street
Harrisburg, PA 17101

August 18, 2010

Dear Chairman Coccondrilli,

Thank you for the opportunity to share our information with you today.

My name is Michael Glass...I am a Pennsylvania resident...my entire life.

I represent a national canine registry and work on a daily basis with dog breeders as an advocate of their rights...while equally considering the health and well being of the animals they care for.

I have over thirty-five years experience in the dog and pet industry. As well...I have worked with hundreds of dog breeders and visited hundreds of dog kennels across the country, including Canada Puerto Rico as well as a few overseas.

Including just over 160 licensed kennels visited right here in Pennsylvania.

We would like you to "disapprove" the regulations today.

In the cover page of my comments I say that we (as commercial dog breeders) are not opposed to regulations.

But then it was brought to my attention that I follow up that statement with 30 pages of we oppose we oppose. Seem a little contradictory? I understand.

The regulations must be written with a reasonable expectation of compliance.

We asked on more than one occasion for the department and Canine Health Board to consider our expert input. Commercial dog breeder's expert input. We were told directly by the Canine Health Board "...we do not need experts...we need data..."

These regulations do need not to be approved today... These regulations only serve to prove Representative Casorio's statement true "...today is the first day of the end of the commercial dog breeder..." as he stated that on the steps of the capitol building when he introduced HB 2525.

Statements have been made that kennels went out of business because they did not want to comply.

This is not true...Many were **forced** out of business. Because they did not know what the law requested of them to comply.

We would not be here today if the issue was about a carbon monoxide detector-not within their charge.

Enforcement---not within their charge

An engineer being responsible to know our law---not within their charge

Inclusion of penalties...Window shades (which by the way-I hope I read this wrong, but window shades are illegal)...and a handful of other minor concerns that are not within their charge.

The basis of this law was generated on emotion and outrage...and must take into consideration that the **purpose** of this new law

AGAIN The regulations must be written with a reasonable expectation of compliance.

We understand that after we walk out of a legislator's office...or after we get off the telephone with the department...that the next meeting...or the next telephone call is likely to be an opinion or agenda for stricter regulations...we understand that.

There are people ---dog breeders --- in this state that are not unreasonable---not unwilling to change---

We asked the department to include us in the writing of these regulations.

The department would like you to believe that they did just that...sure we offered our comments...sure we expressed our concerns...we were heard ...but we were not listened to.

This document is proof to that.

The department would like you to believe that the dog breeders do not want to go through another process of tailoring regulations causing more delays.

This is not true.

Please forgive this elementary figure of speech---but it would be like saying would you rather be hit in the head with a shovel or punched in the chest with a two by four.

Neither is good.

Meaning 'passing the regulations or not passing the regulations' leaves us at an impass.

We have contacted the department and once again offered our input.

We understand the regulations cannot be amended ---but the department has the authority to revise them...

We understand there were 300 + kennels then 100 and at the end of this 50-40-30.

At the risk of being misquoted that is not our issue at this time...our concern is..."What foundation is laid for the future of the dog breeding industry in Pennsylvania..."

We take a look at the regulations on the scale and find them "on the scale" but on "the high end of the scale...of almost all respects.

Lighting 40-60 ...when various industry standards show functionality as low as 20 foot candles

Ventilation of 100 cfm... when various industry standards allow for as low as 10 cfm...

Ammonia 15 ppm 55 OSHA

Two mechanical systems...where one may be efficient

Sub floor temperature control is now illegal--regardless of what the department says "THEY MEANT"

Reporting malfunctions...(possible infringing on our 5th amendment)...

Let's change nature's diurnal light cycle ...and ...create a heat index for an animal that does not sweat.

As the story goes...can someone please explain this to me ... like I am a six year old?

Times are different and expectations are higher.

We have come this close...and the department would like you to believe a delay is too late...

NOT TRUE...we have seen the department act quickly...and we are ready to get involved...

Please do not pass these regulations...ISSUE A DISAPPROVAL... while we will once again request the department personally involve our input for resubmission with revisions with the allotted 40 days.

Respectfully,

Michael Glass



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