

Attachment ②

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

August 18, 2010

Dear Chariman Coccodrilli,

I am writing to you regarding the new standards the Canine Health Board has submitted to you. I am a breeder of Champion Boston Terriers and French Bulldogs of over 30 years duration. I am also on the Dog Law Advisory Board for commercial kennels.

I am concerned with several issues in this latest attempt to provide "standards" for the commercial kennel industry in Pennsylvania. First of all I would like to point out something that seems to be overlooked in all this... When the new law passed and in the year that followed its passing-- the number of commercial kennels in this state went from over 300 to the current number of 110... So the regulated community is now TWO THIRDS smaller than it was before the law. Those that "left" the industry were kennels that could not or would not comply with the new law. In effect many of these were most probably the kennels the new law sought to eliminate... the so called "bad guys". Although some very GOOD kennels ended up unintended victims--- the end result in my mind is "mission accomplished" for those that wrote the law.

We are now left with one third of the number of original kennels with a portion of those kennels holding waivers--- and they are waiting for complete standards to know how exactly to comply with the law and my personal prediction is some of THOSE kennels will also leave the industry..

I want you to know, I as the commercial kennel representative have tried VERY hard to make my voice HEARD over and over again... As have MANY members of the regulated community. I am not pleased to tell you that OUR input... the regulated community AND people with vast experience in breeding and raising dogs has virtually gone UNHEARD. I personally am tired of being made to feel like OUR input is not needed or valuable and that by listening to US, somehow we would lobby for substandard kennels, and nothing could be further from the truth.

Some points in THIS set of standards...

Once again we are facing a "mechanical device" that will monitor temperatures and humidity ALL THE TIME in our kennels. This is attuned to be inspected 24 hours a day. It smacks of us being criminals who need round the clock monitoring... I submit that routine inspections, which are always done unannounced, should be all that is needed to determine if a kennel is in compliance or not.

It has been stated by Dog law--"We need SOME regulations in place to get these kennels started"--I submit these regulations are STILL out to not "get them started" but to put them out of business.!!!

The "radiant heat floor" issue is just ludicrous... Heat in FLOORS with "zones" to regulate the temp will NEVER burn a dogs feet OR a humans feet... the need for ANOTHER heat source when radiant floor heat is in place is just burdensome and unnecessary. I could go on and on with these regulations... but I am sure you have heard the "problems" listed from many others...

I would like to take a moment to address the flooring for nursing mother's issue. I would like to start by telling you that I PERSONALLY raise my puppies on totally solid flooring... and I would also like to point out that the new law AS WRITTEN... provides for dogs OR puppies being on NON solid flooring as long as their feet cannot go through or be caught by the non solid surface. I also can personally tell you that a SAFE non solid floor for puppies is not only NOT HARMFUL--it is CLEAN and sanitary environment FOR the mother and the puppies. Neither the mother OR the pups is going to remain ON non solid flooring for long lengths of time as some people would have you believe. I have heard it stated that MOTHER dogs would be on this for 6 months of their lives--in a year... Even at two litters per year this is a huge exaggeration--and really shows that those that oppose this know little to nothing about nursing mothers or raising puppies. Every vet's office I have ever seen has NON SOLID flooring for temporary use...for SANITARY reasons... but kennels should not be allowed to use the same thing?

I respectfully ask you to NOT APPROVE these regulations as they are written... and ANY influence you have to exert to allow GOOD breeders to help write a DECENT set of standards for the industry would be SO appreciated. Veterinarians (the CHB) are GREAT at illness in dogs... diagnosing problems, care etc... but I submit to you GOOD breeders know a whole lot more about breeding dogs and raising puppies. Contrary to what has been said about commercial breeders--there are MANY who strive to do this well and welcome good and reasonable standards... I am one of them.

Sincerely,

Marlene Lippert

Dog Law Advisory Board for Governor Rendell