

#2785

From: Julian Prager [Pennfedlaw@verizon.net]
Sent: Wednesday, October 07, 2009 5:45 PM
To: Jessie L. Smith; Susan West; IRRC
Cc: Hon. Michael Hanna; Hon. John Maher; Hon. Michael W. Brubaker; Hon. Michael A. O'Pake; Diane Hain; Kerry Golden; Kristin Crawford; Bill Evans
Subject: Re: ID #2-170 (#2785) Canine Health Board Standards for Commercial Kennel Regulations (7 PA Code, Chapter 28a)
Attachments: Canine Health Board Final Letter.doc; ATT163904.htm

Attached find the comments of the Pennsylvania Federation of Dog Clubs and the National Animal Interest Alliance on the proposed Canine Health Board Standards for Commercial Kennel Regulations.

Julian Prager
Pennfedlaw@verizon.net

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#2785

PA Federation of Dog Clubs
National Animal Interest Alliance
c/o Julian Prager
7552 Stein Road
Zionsville, PA 18092-2920
October 7, 2009

Jessie Smith
Special Deputy Secretary
Bureau of Dog Law Enforcement
Department of Agriculture
2301 North Cameron Street
Harrisburg, PA 17110

Re: ID #2-170 (#2785) Canine Health Board Standards for Commercial Kennel Regulations (7 PA Code, Chapter 28a)

Dear Special Deputy Secretary Smith:

These comments are submitted on behalf of the Pennsylvania Federation of Dog Clubs (PFDC) and the National Animal Interest Alliance (NAIA). PFDC is comprised of dog clubs in the Commonwealth and their members who show and train dogs in conformation, performance and sporting venues. It represents small, hobby breeders who produce dogs primarily with the intent of showing them in events or using them in sporting or working activities. NAIA is a national organization with the mission of promoting the welfare of all animals, strengthening the human-animal bond, and safeguarding the rights of responsible animal owners. Although neither of these groups represents commercial kennel owners *per se*, both groups are concerned when the rights of individual owners or breeders are compromised without legal justification.

We appreciate the work the Canine Health Board (Board) has done in reviewing health standards under Section 221 of the Dog Law (Act 119). Most of the requirements of the Standards address areas affecting the health of dogs and are generally reasonable. However, we believe that there are some areas where the Standards present problems because they are vague and do not provide sufficient guidance to the public, the potential fiscal impacts are misstated, there are potential internal conflicts among the Standards, or the Standards established by the Board are *ultra vires*.

COSTS

Commonwealth

The analysis of costs and revenue loss to the Commonwealth is faulty and underestimates both the cost and revenue loss. On the cost side, the Department states that it will cost the Commonwealth \$94,775 in FY 1 (without optional costs) and \$675 annually thereafter to replace equipment in FY 2-4. However, the Department attributes no cost in several areas where the cost is not able to be determined. There is a significant difference between a cost that may not be estimated accurately and no cost at all.

The cost estimate for additional staff required to perform inspections at commercial kennels is listed as \$0, despite the fact that the relative humidity and particulate matter are

to be measured at locations randomly selected of 10% of the dogs in the kennel, the ammonia level is similarly measured with an additional four locations for measurement, and the air velocity is similarly measured with the addition of all intake and exhaust vents. It is unclear how the Department is able to estimate it will not cost more to do this than to perform the more limited, current procedures. In addition, significant additional time will be required to enter these data on the new inspection form, to ensure their accuracy and readability and to ensure accurate data entry of these multiple data points into the new system.

Furthermore, the Department estimates no revenue impact from these regulations. However, the Department is already reporting an increase in the number of commercial kennels voluntarily closing due to the pending full implementation of Act 119 of 2008 and the expected commercial regulations. Since license fees are a significant part of the department's revenue base for dog law enforcement, it is unrealistic to assume no impact on revenue resulting from the implementation of these regulations.

Regulated Community

With respect to costs to the regulated community, the costs are underestimated. The department states the "kennels that choose to mechanically circulate and filter" their internal air will have a cost of from \$5,000 to \$13,000 per unit for 5,700 cubic feet per minute of circulation and states that most commercial kennels are less than 5,000 square feet. It then requires in the regulations that when the ambient temperature is 85 degrees Fahrenheit or higher (a condition found in all Pennsylvania counties in the summer months) that the use of mechanical ventilation is mandated. It provides an optional cost of \$2,955 for purchasing devices to measure temperature, humidity, ventilation, ammonia and particulates. However, it is unreasonable to require a business to meet certain standards and not to assume the business will purchase those devices needed to ensure compliance with the law and regulations issued under it. Therefore, the minimal cost to commercial kennels should be raised from \$20 to at least \$7,975 per kennel, or a minimum of \$2,791,250 for the regulated community.

REQUIREMENTS OF THE LAW

Act 119 limits the reach of the Board to distinct, circumscribed areas. Section 211 establishes the Board, its process and the scope of its powers. Under Subsection (f), the purpose of the Board is stated: "to determine the standards based on animal husbandry practices to provide for the welfare of dogs under Section 207(h)(7) and (8) and (i)(3)." In addition, under Section 207 (i)(5) the Board may, upon a commercial kennel owner's request, consider "on a case-by-case basis for an alternative means of allowing clearance from a primary enclosure to the exercise area or exercise that is required in paragraphs (4) and (6)(i) if the kennel owner presents the board with a plan that the board determines is verifiable, enforceable and provides for exercise equal to or greater than that which the dogs would receive under paragraphs (4) and (6)(i)."

Insofar as the proposed regulations issued by the Department are required by law to be issued based on the Board's Guidelines, we must evaluate the authority of the Board to establish these Guidelines. The Board cannot establish requirements that run counter to the statutory requirements. See also Pennsylvania Professional Pet Breeders Association, et al v. Dep't of Agriculture (U.S. District Court for the Middle District of Pennsylvania, Civil No. 1:CV-09-1644, Pg. 9). Since the Board cannot establish standards inconsistent with

the law, it is inappropriate to bootstrap regulations that are *ultra vires* into final form regulations when the regulations were invalid *ab initio*. However, there are areas within the guidelines that may be *ultra vires* for the Board, but within the authority of the Department to issue regulations. To the extent it is possible, these comments have tried to separate these issues so that regulations which are outside the Board's authority, but not delegated to the Board exclusively under the law, are deemed legal unless otherwise objectionable.

PROPOSED REGULATIONS

Section 28a.1 Definitions

We have no comments on this section.

Section 28a.2 Ventilation.

Statutory Language

Regarding the ventilation standards, Section 207(h)(7) states that "Housing facilities for dogs must be sufficiently ventilated at all times when dogs are present to provide for their health and well-being and to minimize odors, drafts, ammonia levels and to prevent moisture condensation." Furthermore, it provides that the "relative humidity must be at a level that ensures the health and well-being of the dogs housed therein." It authorizes the Canine Health Board (the Board) to "determine auxiliary ventilation to be provided if the ambient air temperature is 85 degrees F or higher " and authorizes it to determine the "appropriate ventilation, humidity and ammonia ranges . . ."

The Section 207(h)(7) does not authorize the Board to prescribe the methods of achieving the standards it determines are appropriate. It is authorized only to determine the relevant standards related to the health and well-being of dogs housed in the kennels, based on animal husbandry practices.

Regulatory Comments

From that reading, it is our belief that the Board and the Department erred in requiring mechanical ventilation systems for use in commercial kennels in a number of subsections of Section 28a.2. Furthermore, it is well documented in literature related to animal husbandry that building design and non-mechanical means may be used to provide adequate levels of ventilation. Since animal husbandry standards are established as the foundation upon which Board's standards are to be based, the standard requiring the use of mechanical means for ventilation is inappropriate.

Similarly, the requirement in Subsection 28a.2(1) to keep the temperature below 86 degrees when dogs are present is beyond the scope of the Board's or the Department's authority as defined in the statute. If the legislature had intended to provide a maximum temperature setting, it could have done so in the statute. We believe that the legislative history of the act makes it clear that the intent of the language in the statute was to have the Board do exactly what the statute states, i.e. determine additional ventilation requirements in commercial kennels at temperatures above 85 degrees to reduce the

impact of higher temperatures on dogs in the kennels in accordance with animal husbandry practices. Furthermore, by inference Section 207(h)(6) of the act permits the temperature to exceed 85 degrees, provided the ventilation standards are met.

An ancillary problem with the requirement to use mechanical ventilation when the temperature exceeds 85 degrees is that it will have a disparate impact on a protected class – those whose religious beliefs prohibit or severely restrict the use of electricity. Any regulation that would require violation of their religious beliefs must be subject to significant scrutiny. In cases like this, where it is apparently beyond the authority granted the Board or the Department, it cannot be supported.

Furthermore, obtaining randomness is a highly technical, scientific process. Just choosing dispersed areas of measurement does not do it. If the measurements are not actually randomly made, any resulting enforcement actions are subject to challenge. Therefore, we suggest the use of a different standard of selecting measurement locations. This comment applies to all references to random measurements in the regulations.

We believe a better standard, requiring fewer measurements, but providing the necessary measurements and records, would be:

28a.2(1) (a) Each kennel shall utilize functional ventilation, air movement, heating and/or air-conditioning and/or humidity control systems that provide the required ventilation and air movement to each area of the kennel where dogs are housed when the temperature is out the range provided in the statute.

(b) All measurements shall be made at the standing shoulder level of dogs housed in the kennel in the middle of each room of the kennel in which dogs are housed or, in kennel rooms larger than 1,000 square feet, at least at one point for each 1,000 square feet or part thereof measured at points central to each portion of the room divided in sizes as equal as practicable.

In Subsections 28a.2(2) and (3), the requirements are excessive and time-consuming. It is unclear where the temperature is to be measured. One possibility is that the temperature will be measured at the standing shoulder height, in their enclosures, for a randomly chosen 10 percent of the dogs. This appears to be what is meant in Subsection (4) where there is a specific reference to the measurement being done in each primary enclosure of the 10% of the dogs. Another interpretation is that the average standing shoulder height of a randomly selected 10 percent of the dogs will be used to measure the temperature, but in unspecified locations. The former interpretation will significantly increase the workload of the dog wardens; in the latter case, more specificity is required

This Standard will require 10 independent measurements in a 100-dog kennel, increasing the time required to perform each inspection and to record and maintain related data, in addition to adding time to reset the thermometers between readings. The result would be increased costs for staff and supplies, which will be transferred to the commercial kennels and purchasers of their puppies.

The requirements of Subsection 28a.2(4) are clear and specific. If this standard were implemented in final regulations, it would require significantly increasing the time for each inspection since the ammonia detector would have to be reset after each measurement

and calibrated periodically. In a 100-dog kennel, the Guideline would require 18 separate measurements. This would result in the need for more staff by the Department to perform its duties, for recording significantly more data, and the purchase of multiple ammonia detectors. We understand the need to measure ammonia levels in corners and along walls, but wonder whether fewer measurements in total might be sufficient to obtain reliable and valid data to evaluate the health of the dogs in the kennel.

The standard in Subsection 28a.2(5) is internally inconsistent and appears arbitrary, capricious and an abuse of authority. It requires that CO be kept below detectable levels in all areas of the kennel and requires detectors able to monitor the level throughout the entire facility. These detectors must meet the standards set in UL 2034 or IAS 6-96.

However, according to the U.S. EPA, the air quality standard for **outdoor air** is 9 parts per million (40,000 micrograms per meter cubed) for 8 hours, and 35 parts per million for 1 hour. While the EPA states that there are no standards agreed upon for indoor air quality, they recognize that the CO level near a properly adjusted gas stove is 15 parts per million. Therefore, it is improper to establish a standard for acceptable levels of CO as being undetectable, both because there are no recognizable standards for indoor CO levels in either human or animal husbandry practices and because the mandated level is below the levels the EPA determines exist in both outdoor and indoor air in general.

The reference to the UL Standard 2034 is inappropriate since the standard states in 1.1 that it covers detectors "in ordinary indoor locations of dwelling units, including recreational vehicles, mobile homes and recreational boats with enclosed accommodation spaces and cockpit areas." These are clearly not animal husbandry uses. If this standard were applicable, it permits a carbon monoxide concentration of 70 parts per million with an alarm response time of between 60 and 240 minutes as an acceptable operating level. The acceptable response time decreases to between 4 and 15 minutes at 400 parts per million. If installation of CO alarms is mandated, the acceptable levels should be within the functional parameters of the alarms.

We do not comment on the standards regarding IAS 6-96 since we have been unable to obtain a copy to determine what it requires. However, we expect that our comments would parallel those regarding UL 2034.

We suggest the following language as preferable in the standard:

28a.2(5) Kennels shall install, and maintain the operability of, carbon monoxide detectors with the ability to monitor the carbon monoxide level throughout the entire facility in which dogs are housed. The detectors must meet or exceed the UL standard 2034 or the IAS 6-96 standard, or their successor standards. When an alarm sounds, the kennel owner or manager shall immediately activate auxiliary ventilation or use alternative means to reduce the carbon monoxide level below the point where the detectors sound an alarm.

In Subsection 28a.2(6), we note again our objection to the requirement for mechanical systems. Furthermore, we believe the requirement in the subsection, as worded, would create delays taking corrective action. Not only is the Bureau unstaffed on evenings and weekends, but also it may not be possible or necessary to obtain this information from the Bureau before corrective action is taken. We believe better language to protect the health of the animals, to reduce Bureau staffing requirements, and to not require the Bureau to

have staff available that are knowledgeable in all types of mechanical ventilation systems would be:

28a.2(6) In the event of a malfunction of the systems required under these rules, the kennel must have windows, doors, skylights, or other openings in the structure that shall be operable to maintain ventilation. In the event of a system malfunction, the kennel owner or manager shall:

- (a) immediately take any necessary actions to achieve compliance with the standards established in this section, and
- (b) immediately take all necessary actions to correct the malfunction, and
- (c) as soon as practicable, notify the Bureau of Dog Law Enforcement during normal business hours of the failure and the steps taken to achieve corrective action.

Subsection 28a.2(7) is beyond the scope of the authority of the Board. Standards for particulate matter are not covered by the statutory authorization granted to the Board under Section 207(h)(7). This area, although affecting the health and welfare of the animals in the kennel, is not within the authorized scope of the Board and may not be bootstrapped merely by referencing ventilation. However, it may be within the authority of the Department to proposed regulations in this area. As the IRRRC stated in its February 2009 Newsletter, a regulation may be deficient where it conflicts with or duplicates a statute. The statute contains cleanliness standards for commercial kennels in section 207(h)(14)(i). "Excreta, feces, hair, dirt, debris and food waste must be removed from primary enclosures at least daily or more often if necessary to prevent an accumulation of excreta, feces, hair, dirt, debris and food waste to prevent soiling of dogs contained in the primary enclosures and to reduce disease hazards, insects, pests and odors." We believe the proper interpretation of this section does not permit either the Board or the Department to set measurement standards for particulate matter in commercial kennels.

The approach in Subsection 28a2(8) is interesting. Clearly air change may be set at a required level. In fact, this is the appropriate method of ensuring that noxious air contaminants remain at satisfactory levels. If air circulation and exchange levels are properly determined, ammonia levels, CO levels and other contaminants will be properly controlled. However, we question the need for fresh air changes at the rate of one air change every 7.5 minutes (8 exchanges per hour) and its impact on achieving other standards in the regulations where the outside air temperature greatly exceeds or is below the required temperature range in the act. Maintaining temperature and humidity at levels to provide protection for the animals may not be possible when the outside temperature is 100 degrees and the humidity is 95 percent if the required fresh air exchange standard is to be met. Conversely, it may be difficult to achieve sufficient temperatures inside when the outside temperature is below zero in the winter if the air exchange standard is to be met.

In addition, the relationship between this Subsection and Subsection 11 is unclear. This subsection states that air changes must occur with fresh air; subsection 11 refers to the use of recirculated air. If there is sufficient fresh air being circulated, it is not clear how

recirculated air in addition to the fresh air requires any treatment. If filtered, recirculated air is permitted, why is it not included in the calculation of air changes, without reference to fresh air changes?

Subsection 28a.2(9) attempts to expand the authority of the Board to areas of animal stress by bootstrapping it to the authority to set ventilation standards. However, correlation is not causation. The authority of the Board extends only to setting appropriate levels specified in the statute. Although this is a valid health concern and stress reduction does affect animal health, it is not covered by the scope of the statutory authority of the Board. While the Department may issue regulations in this area, Paragraph 9 does not present a valid, enforceable standard. This Paragraph, as worded, makes it illegal for dogs in commercial kennels to become sick or to die, to be shy or develop skin conditions. Although these are not desirable conditions, it is beyond reason to penalize a commercial kennel if a dog dies or gets sick. These guidelines would be a valuable teaching tool for wardens as to conditions that may indicate problems in the kennel. However, they cannot function as enforceable standards within a rational regulation.

Subsection 28a.2(10) is unnecessary in that it restates the provision of the statute or other regulations in all respects and is unenforceable in that the measurement is subjective.

Subsection 28a.2(11) is addressed by the comments on Subsection (8).

Subsection 28a.2(12) is unclear as to its meaning. Most codes establish standards for new construction. Existing buildings are permitted to continue operating under the codes in place when they were constructed until there is a major renovation. At that time, upgrading systems to the new code is required. We have no objection if the intent of this subsection is to follow the standard building code and zoning practice as it applies to buildings used for animal husbandry purposes. We believe that a requirement to upgrade existing buildings to current standards whenever there are changes to the standards is contrary to normal industry and governmental practices and would cause significant fiscal harm to the regulated community. We suggest the following language be applied here and with respect to all references to building codes:

28a.2(12) Ventilation systems must comply with the applicable building codes at the time of construction and shall be updated to meet successor codes when major structural renovations are made.

We note that the Preliminary Guidelines issued by the Board suggested temperature levels for neonates, although they are not included here. We believe it is within the authority of the Department to issue such regulations for the proper care of neonates, which have a different susceptibility to temperature ranges than adult dogs. We suggest the following language:

28a.2(13) Neonates under 3 weeks of age must have access to a portion of the enclosure with a temperature not lower than 80 degrees.

Section 28a.3 Lighting.

Statutory Language

Section 207(h)(8) states: "Housing facilities for dogs must be lighted well enough to permit routine inspection and cleaning of the facility and observation of the dogs. Animal areas must be provided a regular diurnal lighting cycle of either natural or artificial light. Lighting must be uniformly diffused throughout housing facilities and provide sufficient illumination to aid in maintaining good housekeeping practices, adequate cleaning and observation of animals at any time and for the well-being of the animals. Primary enclosures must be placed so as to protect the dogs from excessive light. The appropriate lighting ranges shall be determined by the Canine Health Board."

Regulatory Comments

We would add a new Subsection before Subsection (1) to read as follows and renumber all the following subsections:

28a.3(1) Each kennel shall have a mixture of natural and artificial light of at least 80 foot-candles during daylight hours and at no more than 5 foot-candles during nighttime hours.

This standard sets the levels of lighting in the kennel, as permitted to Board by the law.

Despite the statement made in the first sentence of Section 28a.3, Subsection 28.3(1) goes beyond the authority of the Board, which is authorized only to establish lighting ranges. The statute explicitly permits either artificial or natural light and neither the Board nor the Department has the authority under the statute to require natural light.

Even if the Board had the authority to prescribe natural lighting, it would lack the authority to require transparent windows in Paragraph 28a.3(1)(ii), as contrasted with translucent windows, since it is only the level of light that may be regulated. Insofar as the amount of glazed area in Paragraph 28a.3(1)(ii) can be related to the amount of light provided, it is within the grant of authority by the legislature. Furthermore, we note that the approach taken by the Board has completely eliminated one source of acceptable natural light frequently found in the animal husbandry practices of kennels. That is the use of translucent or transparent door inserts in doors used for providing unfettered access to outdoor runs. These doors are widely used in kennels and provide significant natural light in each primary enclosure during the hours of natural daylight.

Paragraph 28a.3(1)(iii) duplicates the statutory language and is unnecessary.

Paragraph 28a.3(1)(iv) is beyond the scope of authority of the Board in that it does not cover lighting ranges in housing areas or primary enclosures. However, since shade is an important health requirement for dogs outside in the heat, this is an appropriate regulation for issuance by the Department under its authority.

Paragraphs 28a.3(1)(v) and (vi) exceed the reach of the Board's authority under section 207(i)(5), which extends to determining that a plan is verifiable, enforceable and provides for exercise equal to or greater than that which the dogs would be provided should the Department grant an exemption from outdoor exercise under Section 207(i)(6)(x)(B).

There is nothing in the statute to suggest that the Board has the authority to proscribe different lighting requirements for kennels where waivers are granted. Furthermore, transparent windows set at a height to permit each dog to have an unobstructed view of the outdoor environment could prove dangerous since they would have to be set at or slightly above the dog's eye level. This might result in dogs trying to exit through a closed or partially opened window, resulting in injury to the dog. We refer again to our comments, above, regarding transparent or translucent inserts in kennel doors. We believe the following regulations issued by the Department would meet the goals of the Board and stay within the provisions of the statute:

28a.3(1)(v) If a department grants a kennel a waiver for indoor exercise under section 207(i)(6)(x)(B) of the Dog Law (3 P. S. § 459-207(i)(6)(x)(B)), the department may require as a condition of the waiver that natural light enter into each primary enclosure for a portion of the period of natural daylight.

28a.3(1)(vi) If the department grants a waiver to a kennel for indoor exercise under section 207(i)(6)(x)(B) of the Dog Law (3 P. S. § 459-207(i)(6)(x)(B)), the department may require as a condition of the waiver that full spectrum lighting be provided for the entirety of the daytime light cycles in areas that house dogs.

Paragraph 28a.3(2)(i) also exceeds the authority of the Board in that lighting type is not something the Board is authorized to specify. Exposure to full spectrum lighting is desirable for dogs not having access to outdoor exposure to natural lighting. It would be acceptable for the Department to require full spectrum lighting be provided in those kennels where the department grants a kennel a waiver for indoor exercise similar to the provision presented above.

Paragraph 28a.3(2)(ii) is superfluous in that it duplicates the statutory requirement of diurnal lighting.

Paragraph 28a.3(2)(iii), (iv) and (v) are beyond the scope of authority of the Board under the law. However, they are reasonable standards for the Department to establish for the safety of animals.

Our comments on Subsection 28a.3(3) are the same as those made with respect to Subsection 28a.2(12).

Section 28a.4 Flooring

Statutory Language

Section (i)(3)(i) specifies that flooring "shall be strong enough so that the floor does not sag or bend between the structural supports, shall not be able to be destroyed through digging or chewing by the dogs housed in the primary enclosure, shall not permit the feet of any dog housed in the primary enclosure to pass through any opening, shall not be metal strand whether or not it is coated, shall allow for moderate drainage of fluids and shall not be sloped more than 0.25 inches per foot." It further authorizes permissible slatted flooring for commercial kennels in section 207(i)(3)(ii) and authorizes the Board in subparagraph (iii) to approve additional flooring options that meet the provisions of Section 207(i)(3)(i).

Regulatory Comments

Subsections 28a.4(1), (2), (3), and (6) and (8) properly follow the Board's scope of authority. However, it would be preferable to list the specific sections within the dog law relevant to the flooring standards, rather than refer to the entire dog law since this provides little guidance to the regulated community regarding where the other standards can be found.

Subsection 28a.3(4) appears to require the use of a resting board, which provision had been removed in a prior regulatory review. A properly designed radiant heating or cooling system will be thermostatically regulated to maintain proper temperature levels on the surface to obtain the desired air temperature. Since the regulations do not address the issue of dogs being too warm during the heating season or too cold during the cooling season with regard to the ambient air temperature, it is not appropriate to restrict the use of radiant heating or cooling except as it produces heating outside the mandatory ranges. It is unlikely in the extreme that a commercial kennel would spend more than is necessary to control the temperature levels in the kennel.

Our comments to Subsection 28a.4(5) are the same as those made with respect to Subsection 28a.2(12) and Subsection 28a.3(3).

Subsection 28a.4(7) is both unnecessary as duplicating the provision of the statute and exceeds the authority of the Board in that they are not granted the authority to order microbial assessments. The Department may have the authority to order a microbial assessment where there is evidence of a violation of the law or a regulation, but this does not provide a measurable and enforceable standard suitable for a regulation.

Despite the short time frame within which the Board had to issue these Guidelines, we had hoped that the Board would be able to consider and approve additional flooring options that were in conformance with Section 207(i)(3)(i). Absent any other approved flooring, the provision of this section will have a significant fiscal impact on the regulated community, will not provide adequately for flexibility in providing for the welfare of dogs within the law and may ultimately result in a fiscal impact on the public through increased cost for dogs.

Sincerely,

Julian Prager
PFDC Legislative Chair
NAIA Legislative Coordinator