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From:

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Sent: To: Wednesday, October 14, 2009 3:22 PM

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Subject:

Proposed regulations re: Act 119

Following are comments on the proposed regulations to implement Act 119 in the Dog Law.

The new proposed Canine Health Board regulations concerning commercial kennels are, in many respects, academic engineering standards which do not comport with the actual and circumstances of commercial kennel operations. These regulations will require the Dog Law Enforcement Bureau of the Department of Agriculture and commercial kennel operators each to purchase costly technical equipment, and send their personnel for training in the use and maintenance of such equipment. This fiscal impact has been substantially underestimated by the framers of the regulations. The proposed regulations concerning carbon monoxide have no basis in Act 119. Additionally, the proposed rules concerning kennel temperatures, humidity, and air changes are presented without the required explanations of how these standards were computed and/or otherwise determined, or justified, as required by IRRC regulation.

Sincerely submitted by Linda North Glick

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