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From: Brownfield, Jill [jbrownfiel@state.pa.us] on behalf of AG, CHBcomments [CHBComments@state.pa.us]
Sent: Monday, October 26, 2009 1:34 PM
To: dhain@pahouse.net; IRRRC; kebersole@pasen.gov; Kennedy, David C. (AG); Kerry Golden; MULLER, JENNIFER; Smith, Jessie L; Thall, Gregory (GC); wgevens@pasenate.com
Subject: FW: Proposed Regulations: Canine Health Board Standards for Commercial Kennels
Attachments: Penn Dog Letter Whitney[1].doc

INDEPENDENT REGULATORY
LEADER (MEMBER)
2009 OCT 26 PM 4:16
RECEIVED

From: Bob Whitney [mailto:robert.whitney@comcast.net]
Sent: Sunday, October 25, 2009 9:11 PM
To: AG, CHBcomments
Subject: Proposed Regulations: Canine Health Board Standards for Commercial Kennels

October 25, 2009

To: Canine Health Board, c/o Pennsylvania Department of Agriculture, Bureau of Dog Law Enforcement, 2301 North Cameron Street, Room 102, Harrisburg, PA 17110
Re: Proposed Regulations: Canine Health Board Standards for Commercial Kennels

Dear Sir:

This letter is in support of the Proposed Regulations: Canine Health Board Standards for Commercial Kennels. My veterinary medical credentials include over 20 years with the U.S. Army working in research with dogs and other animals, and with the National Institutes of Health, U.S. Public Health Service (PHS). AT NIH, I directed programs at Branch and Division level in which dogs and other species were bred and used. We also set standards for those dogs obtained from breeders. I attained the rank of Rear Admiral (08) in the PHS, highest of any veterinarian in history, and the only veterinarian as the Surgeon General of the United States. I am currently a member of a National Research Council committee preparing a report on dogs. The National Academy Press will release a report from this committee, and another ILAR committee currently revising the *Guide for the Care and Use of Laboratory Animals*, within a few weeks. Both documents address many of the issues contained in the Proposed Regulations.

The science of animal care, like that of human medicine, is not absolute. It evolves with time as new discoveries are made and new equipment provides a measure of heretofore-immeasurable parameters. Nevertheless, animal care is not in the dark ages. For decades studies have been published and reports of the NRC and other reputable agencies and scientists have served to provide solid groundwork for the development of standards by which dogs are bred, reared, and cared for. The report of the Canine Health Board continues along these lines, reflecting the fine work and recommendations made by former individuals and committees who have struggled with these same issues. Their recommendations may conflict with the desires of some professional associations and breeders (such as those characterized as "puppy mills"), whose financial interests obscure their better judgment, but the Canine Health Board's research and recommendation cannot be disparaged.

The Canine Health Board sought guidance from informed individuals and from a wealth of published literature by the US Department of Agriculture, NIH, PHS, NRC, animal welfare organizations, scientific journals, state and local government and institute standards, the UK's Universities Federation for Animal Welfare, and many

others. They clearly did their homework as demonstrated by their recommendations for the physical and environmental (heat, humidity, lighting, temperature, sanitation, air flow and quality, types of flooring) conditions. I sincerely urge that these regulations be accepted and become the law of Pennsylvania.

Sincerely,

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