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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 1:30 PM  
**To:** dhain@pahouse.net; IRRRC; kebersole@pasen.gov; Kennedy, David C. (AG); Kerry Golden;  
MULLER, JENNIFER; Smith, Jessie L; Thall, Gregory (GC); wgevans@pasenate.com  
**Subject:** FW: Comments on Proposed Dog Regulations  
**Attachments:** Penn. Dog Letter.doc

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**From:** Tom Wolfle [mailto:twolfle@hughes.net]  
**Sent:** Sunday, October 25, 2009 6:36 PM  
**To:** AG, CHBcomments  
**Subject:** Comments on Proposed Dog Regulations

Please see attached.

Thomas L. Wolfle, DVM, PhD  
5250 Wilson Rd.  
Cambridge, MD 21613

RECEIVED  
2009 OCT 26 PM 4:10  
DEPARTMENT OF GLAUCOMA  
EYE/CATARACT

Thomas L. Wolfle

October 25, 2009

Re: Proposed Regulations: Canine Health Board Standards for Commercial Kennels

Canine Health Board, c/o Pennsylvania Department of Agriculture, Bureau of Dog Law Enforcement,  
2301 North Cameron Street, Room 102, Harrisburg, PA 17110

Dear Sir:

I am writing in support of the Proposed Regulations: Canine Health Board Standards for Commercial Kennels (Board). As a clinical and research veterinarian, retired from service in the Air Force and NASA; National Institutes of Health; and the National Academy of Sciences, National Research Council (NRC) I have over forty years experience dealing with suppliers of dogs and others animals. At NIH, I ran a colony of American Fox Hounds in which we had an average annual inventory of about 1,000 dogs. These dogs were for research, not as family pets, but the National Heart, Lung, and Blood Institute, the major user of these dogs, was adamant that their temperament be no different from those bred for life in homes with children and household activities. I would think that Pennsylvania would do no less for its citizens. I helped initiate and directed the NIH Animal Care and Use Committee and the Interagency Research Animal Committee. Both committees established standards for all animals used in any federal government program—and for all institutions that receive federal funding of any type. These federal agencies include the NIH, U.S. Dept. of Agriculture, National Science Foundation, NASA, and all other agencies in which animals are used. I have published broadly in the scientific literature and spoken to local, national and international scientific audiences on this subject. I come to this issue with some degree of experience.

The Regulations, as drafted by Governor Rendell's Canine Health Board (Board), is absolutely on the mark; no changes must be allowed. As Director of the NRC's Institute of Laboratory Animal Medicine (ILAR), I worked with numerous committees composed of subject matter experts from around the world, similar to the Board. We developed the 1996 Guide for the Care and Use of Laboratory Animals, Laboratory Animal Management: Dogs, and reports on their housing, husbandry, pain, and nutrition. The Guide and a new document on dogs are currently being written by ILAR with new data, ferreted from the scientific literature. On that account, make no mistake of the scientific backing of these reports! Such environmental issues as temperature, sanitation, air flow and quality, lighting, types of flooring and rest areas, social interactions and exposure, housing density, nutrition, and many other details are well researched and the data—buttressed by decades of professional judgment—supporting these areas emphasize the importance of each. The Board is aware of these data and accurately reflected it in their report.

The perceived images of “puppy mills” rampant in Pennsylvania is of no credit to your fine state. Dogs of high quality, recognized by their state of health and behavior—clear bright eyes; healthy hair coats; and species-typical behaviors, physiology and nutrition—results *only* from high quality care such as these regulations propose. Pennsylvania must take the high ground on this issue and resist the pleas of those conflicted by financial or facility issues.

Sincerely,

Thomas L. Wolfle, MS, DVM, PhD  
Public Health Service (ret) Captain (06)  
Diplomat American College of Laboratory Animal Medicine  
Founding Diplomat, American College of Veterinary Behavior.  
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