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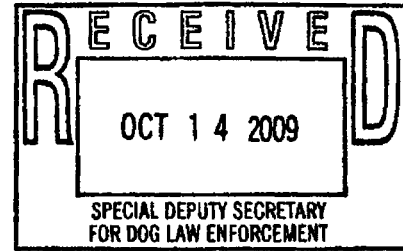
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October 2, 2009

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Pennsylvania Department of Agriculture
Bureau of Dog Law Enforcement
2301 North Cameron Street
Room 102
Harrisburg, PA 17110

INDEPENDENT REGULATORY
REVIEW COMMISSION



Re: Temporary Guidelines for Commercial Kennels

Dear Secretary Smith:

As a concerned Pennsylvania citizen, I applaud measures to ensure the proper management of dog breeding facilities in my state. I respectfully submit the following comments in support of the Department of Agriculture's proposed rulemaking regarding standards for commercial kennels. The notice was published in the Pennsylvania Bulletin on September 12, 2009 (7 Pa.Code CHS. 28 and 28a).

Background:

The Bureau of Dog Law Enforcement within the Department of Agriculture is charged with implementing and enforcing the Dog Law, which was passed to ensure the humane care and treatment of dogs in the Commonwealth. In 2008, the Pennsylvania General Assembly passed significant amendments to the Dog Law and created the Canine Health Board to establish appropriate ventilation, humidity, ammonia, and lighting ranges for commercial kennels, as well as consider alternative flooring options to those set forth in the law. The proposed regulations are the result of the Canine Health Board's recommendations for those standards.

Ventilation:

The proposed regulations require that "ventilation be achieved through a mechanical system that will allow for 8 to 20 air changes per hour, keep consistent moderate humidity, keep the kennel from becoming too hot, keep ammonia levels and particulate matter low, and to keep odor minimized...". While generally I support these standards, it is well established that a minimum of 10 air changes per hour should be required in all animal spaces. As a result, I recommend that the required air changes per hour be changed to reflect this standard.

I commend the Department of Agriculture and the Canine Health Board for proposing a requirement that kennels use a mechanical ventilation system that provides ventilation, heating, and cooling. Such a system is imperative to ensure the health and comfort of dogs housed in kennel facilities.

Conclusion:

Based on the foregoing comments, I fully support the proposed regulatory package presented by the Department of Agriculture and the Canine Health Board with the recommended changes, and encourage promulgation of the new regulations as expeditiously as possible. I hope that any and all beneficial changes are made to promote the health and well being of animals in the state of Pennsylvania. Thank you for your time and consideration.

Sincerely,

A handwritten signature in cursive script that reads "Carol Kiefer".

Carol Kiefer
986 Swayze Avenue
Washington Crossing, PA 18977