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David Zimmerman
25 Hickory Lane
Ephrata, PA 17522-8823

IRRC Chairman Arthur Coccodrilli
333 Market Street, 14th Floor
Harrisburg, PA 17101

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INDEPENDENT REGULATORY
REVIEW COMMISSION

October 23, 2009

Dear IRRC Chairman Coccodrilli,

I am writing this letter to encourage you to vote against the proposed Section 28a changes to the Canine Health Board Standards for Commercial Kennels. I believe the proposals are vague and could create situations that are not the best for the housed animals. Please read the below comments, and I believe you will agree.

One of my concerns is contained in Section 28a.2 which calls for mechanical ventilation to be implemented if the temperatures are above 85 degrees. The reality is that newborn puppies cannot maintain their own body temperatures until after 10 to 14 days of age. Supplemental radiant heat or infra red heat lamps are routinely used to create an average air temperature between 90 or 96 degrees Fahrenheit in the whelping area. This provides the best safety, health, and well-being of the young litter of puppies and is essential for their viability and survival. This mandate would create a separate violation for each puppy and mother and for a breeder to watch as puppies would die from hypothermia.

In Section 28a.2 I am also concerned that kennel owners would be accused of poor ventilation when their animals exhibited such symptoms as panting, elevated temperatures, nervous shivering, etc, when in reality these symptoms can be very common for a variety of other reasons. Inoculation boosters can cause elevated temperatures, playing outside on a warm day cause a dog to pant, and nervous shivering is often cause by the invasion of strangers such as dog law inspectors! These laws might be implemented in an unfair way!

I also believe that in Section 28a.2 the requirement to ensure that particulate matter form such as dander, hair and food is below 10 milligrams per meter cubed is unrealistic. All dog breeders know that puppies love to play in their bedding which is typically wood shavings or shredded paper. It would be impossible to meet the strict requirements of less than 10 milligrams per meter cubed. Again, this is unnecessary stress on owners.

As you can see, these proposals are at best vague leading possibly to misinterpretation, and at worst could cause harm to housed animals. Please vote against these proposals!

Best regards,

David Zimmerman