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INDEPENDENT REGULATORY
REVIEW COMMISSION

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

October 22, 2009

Dear IRRC Chairman Coccodrilli,

I am aware that there are proposed changes to Section 28a of the Canine Health Board Standards for Commercial Kennels. I am very concerned that these changes, if passed, will cause conditions in a kennel to be worse, not better. Please consider the following concerns.

Under the ventilation points, the proposed standard is to implement mechanical ventilation if temperatures exceed 85 degrees. However, the fact is that newborn puppies cannot maintain their own body temperatures and require supplemental heat sources to create an air temperature between 90 and 96 degrees. Puppies would die of hypothermia if this law were to pass and obeyed!

Drafts in a kennel are a great concern and a Federal Law mandates that dogs be protected from drafts in the primary enclosure. However Section 28a.2 dealing with ventilation actually requires 8 – 20 air changes. This would be excessive and could cause excessive drafts in the enclosure. For example, in a building 40' x 100', if there were even 10 air changes it would require 5300 cubic feet of air per minute to be pushed through the building. This would most certainly cause drafting.

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.

Please vote "NO" to these proposed changes as, I believe, they will make conditions worse, not better for the housed animals. We all endeavor to make conditions better and improve the environments for the animals, but I do not think these proposals will satisfy that attempt. Thank you for your time and consideration.

Sincerely,

Levi S. Nolt