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Director Sue West
Dog Law - 2301 N Cameron Street
Harrisburg, PA 17110-9408

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INDEPENDENT REGULATORY
REVIEW COMMISSION

Dear Director West,

Thank you for your kind consideration of the following concerns that I have about the proposed changes to Section 28a of the Canine Health Board Standards for Commercial Kennels. I believe that some of the proposals are vague and perhaps need to be revisited.

In Section 28a.2, the requirement of less than 10 milligrams per meter cubed for particulate matter would be impossible to meet. Dogs love to play with their bedding – routinely wood shavings or shredded paper – and would certainly be present in the kennel.

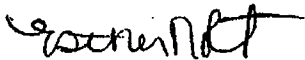
In that same section, I fear that kennel owners would be falsely accused of poor ventilation if their animals exhibited characteristics such as panting, nervousness, and shivering, even elevated temperatures. Although these could be caused by poor ventilation, there are also other very common reasons this could be happening. Dogs pant heavily after exuberant play on a warm day, elevated temperatures could be caused by recent inoculations, and nervous shivering could be due to strangers in the kennel. And so, it is possible that a situation could be misjudged and a kennel owner could be facing fines or civil penalties for a false claim.

Also in Section 28a.2, the ammonia level of less than 10ppm is required. Is this scientifically based? Where has this number been obtained?

The statute calls for mechanical ventilation to be implemented if the temperatures exceed 85 degrees. If passed the law would make it illegal to have any dog in a kennel that is 86 degrees or higher. However, puppies need to have supplemental heat to create an air temperature between 91 and 96 degrees in the whelping area since they cannot maintain their own body temperatures for the first 10 to 14 days of their lives. This law would have puppies dying from hypothermia.

Please vote against these proposals. There is concern among those in the dog business that these requirements would be excessive and unnecessary. Thank you for your time and consideration.

Truly yours,



Esther Nolt
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