

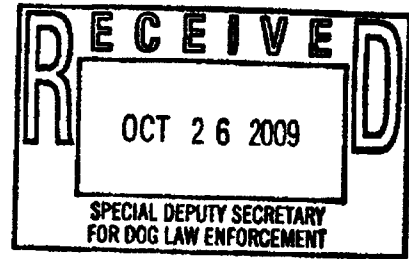
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October 24, 2009

Canine Health Board
 c/o Department of Agriculture
 Room 210
 2301 North Cameron Street
 Harrisburg, PA 17110-9408

Re: Comments to Proposed Rulemaking published
 September 12, 2009
 Canine Health Board Standards for Commercial Kennels

To the Canine Health Board:

Thank you to the Board for their work on behalf of the dogs who are confined in commercial kennels. As I do not have expertise in the technical areas addressed, these comments are general.

**ABSOLUTE KEYS TO SUCCESS WITH THE DOG LAW AND THESE REGULATIONS
 WILL BE ENFORCEMENT, ACCOUNTABILITY AND GOOD FAITH**

Enforcement: First, the promised inspections must happen and they must be thorough. Moreover, if a particular dog warden rarely cites anyone, this warden is not doing his/her job, as violations are rampant. Such wardens should be replaced.

Second, there should be no waivers. As the standards are minimum, a kennel operator who can't or won't meet them, should seek another source of income.

Accountability: Requests for waivers and any granted should be up on the state's web site asap. The name of the vet of record for the kennel should be on the website. The name of a vet who performs a vet check that is ordered pursuant to an inspection should be on the reinspection report, with a notation what treatment if any, was given. The Bureau has done a wonderful service by posting inspection reports. The site needs to include the additional information promptly.

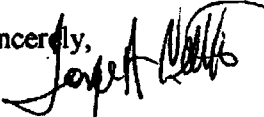
Good faith: The Department of Ag's reputation concerning dogs went from horrendous before Act 119, to precarious now. The voters, majority of whom care about dogs, are watching to see if the Department will now keep faith with the dogs. Regarding the CHB proposed regulations, in the policy statement we read: "(T)he act charges the Board with the duty to determine standards to provide for the health and well being of dogs...". Nowhere is

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the Board charged with applying some kind of balancing test between the health of dogs and the breeders' profits. Many people in the humane community have seen the testimony of the VMA regarding these regulations. (Probably the average vet had no idea what was submitted in his or her name.) The VMA is well-known to be represented by Versant lobbyists, which also represents the Breeders, and includes the erstwhile Secretary of Ag, Mr. Wolff, and former Representative Barley. For sure, the voters are not too dumb to figure out that relationship. The VMA testimony puts the almighty dollar first, and the dogs' welfare comes later or not at all. But you are not in this for the politics, and you have probably spent a huge amount of time doing the job you have been charged with. Now, I urge you not to weaken these regulations, but to keep the integrity you have already shown, and to keep faith with the dogs.

Sincerely,



Joyce A. Nettke,
Attorney at Law