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**From:** Brownfield, Jill [jbrownfiel@state.pa.us] on behalf of AG, CHBcomments [CHBComments@state.pa.us]  
**Sent:** Tuesday, October 27, 2009 4:53 PM  
**To:** dhain@pahouse.net; IRRRC; kebersole@pasen.gov; Kennedy, David C. (AG); Kerry Golden; MULLER, JENNIFER; Smith, Jessie L; Thall, Gregory (GC); wgevans@pasenate.com  
**Subject:** FW: Response to Act 119

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**From:** Liz Williamson [mailto:LWilliamson@pspca.org]  
**Sent:** Tuesday, October 27, 2009 1:16 PM  
**To:** AG, CHBcomments  
**Subject:** Response to Act 119

As a veterinarian employed by the Pennsylvania SPCA, I am writing today in full support of the proposed regulations for lighting, ventilation, and flooring as proposed by the Canine Health Board under their authority of Act 119 passed last year. As part of our investigations of Pennsylvania's commercial kennels, we witness the horrific suffering and even death that are a direct result of the lack of proper standards. In my opinion, the lack of proper care is all too often driven by the desire to increase profits per animal in commercial breeding facilities.

Based upon years of experience as a shelter medicine veterinarian, these proposed regulations will improve the lives of animals in commercial breeding kennels. In fact, many non-profits and smaller organizations comply with these regulations daily, and I see no reason why larger "for-profit" organizations cannot comply with basic standards of care.

More specifically, I support the Canine Health Board's proposed regulations pertaining to ventilation and temperature. As a result of poor ventilation, I have witnessed an increased incidence of respiratory illnesses such as kennel cough and even pneumonia. In general, dogs do not have sophisticated cooling mechanisms and do not tolerate heat as well as their human counterparts. Animals have higher body temperatures and cannot cool themselves quickly or efficiently.

Temperature control is essential to the well being of the animals. There is no number of air changes that can protect a dog if the temperature is in excess of 85F. The federal AWA caps temperature at 85 degrees, and most shelters should be kept at 65- 75F to protect the dogs. Other groups have argued that the Canine Health Board did not have the authority to regulate temperature, but some forms of ventilation can control temperature, and others do not. Protecting the health and well being of the dogs requires a form of ventilation capable of reducing air temperature not to exceed 85F. Otherwise dogs are at risk of heat stroke or death.

Furthermore, in animal shelters and kennels the ventilation system chosen is an important way to control disease. At shelters with inadequate air changes, there are higher instances of respiratory and other illnesses. Most animal shelters work with ventilation specialists because it is known that rates of disease transmission increase with inadequate ventilation.

As a result of inadequate flooring, I have witnessed significant orthopedic issues with the feet and legs of both the puppies and breeding mothers in Pennsylvania's commercial kennels. I have witnessed feet that are bleeding, splayed, and raw as a result of inadequate flooring. These dogs were suffering each and every time they walked. It is also important to note that the orthopedic issues, the pain and suffering, would occur with tenderfoot flooring as well. Tenderfoot flooring is wire flooring with a plastic coating and should not be allowed under any circumstances.

Based upon my experience as a Pennsylvania SPCA veterinarian, the Canine Health Board has met its charge and I fully support the regulations as proposed. As an animal lover and resident of Pennsylvania, I support the regulations.

Dr. Ravi Murarka  
Medical Director, Pennsylvania SPCA

**Liz Williamson**  
Public Relations Associate  
Pennsylvania Society for the Prevention of Cruelty to Animals  
Headquartered at: 350 East Erie Avenue, Philadelphia, PA 19134  
215.426.6300, ext. 224  
856.220.9813 (cell)

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