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

October 22, 2009

Dear IRRC Chairman Coccodrilli,

I am opposed to the approval of the Section 28a Canine Health Board Standards for Commercial Kennels. Please consider the following points and consider voting against these proposals which are, at times, detrimental to the health of the animals in these facilities.

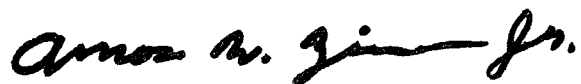
In Section 28a.4, solid flooring is approved for use. I feel that this does not provide the most sanitary flooring environment for dogs. I would like to see this change eliminated from the proposal. I also believe that in the same part, numbers 6 and 8 may be in conflict with each other since it is possible that sealed concrete, painted concrete, epoxy flooring, sealed wood, textured and sealed tile (which are coated materials) could potentially be toxic to some dogs.

I would also like to point out that under Section 28a.4.7, it is stated that a floor may be subject to microbial assessment. However, it is possible that even after it is sanitized, if a dog urinates or defecates on the flooring it will show positive for microbial assessment from the digestive tract of the dog. Therefore it might be impossible for the kennel owner to pass this assessment when in reality the kennel is sanitary.

Lastly, under Section 28a.3, requiring lighting in a kennel to be between 50 – 80 foot candles would be harmful to animals exposed to this high intensity. A typical home is between 12 – 20 foot candles and commercial properties are between 15 to 30 foot candles. Forcing dogs to endure this intensity of lighting would be inhumane. The proposal also calls for lighting to be 50 to 80 foot candles during the day and 1 – 5 foot candles on a night cycle. After researching the cost to achieve this level of lighting with a diurnal light cycle, I believe the costs could be over \$18,500. Besides the inhumanity to animals, the exorbitant cost may cause good kennels and breeders to give up their businesses.

I hope you will vote against these proposals based on these points I have made. Please reevaluate the proposals because I believe many of them to be at the least unnecessary and at the greatest, detrimental to animals.

Best regards,



Amos W. Zimmerman  
937 Glenwood Drive  
Ephrata, PA 17522