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David Stoltzfus
335 Eby Chiques Road
Mount Joy, PA 17552

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

October 22, 2009.

Dear Chairman Coccodrilli,

Please consider the below concerns pertaining to the proposed changes to Section 28a of the Canine Health Board Standards for Commercial Kennels. I believe that in many ways these proposals will be detrimental to the care of dogs in kennels which is, I am sure, not the intended result.

Young puppies are unable to maintain their own body heat and therefore require supplemental heat sources to achieve air temperatures between 91 and 96 degrees. And yet, the new proposal requires kennel owners to keep a kennel at less than 86 degrees. I believe that the Department exceeds their authority to create a law which would make it illegal to keep puppies at a safe temperature.

Requiring 8 – 20 air changes would be excessive. This would actually be in violation to the Federal Law that mandates that dogs must be protected from drafts in the primary enclosure. In a 40' x 100' building the proposal would require that 5300 cubic feet of air per minute be pushed through a facility – certainly causing excessive drafting.

Under Section 28a.3, the lighting requirement of 50 to 80 foot candles is excessive. Actually that intensity could be harmful to the dogs since average home lighting is 12 to 20 foot candles and even commercial lighting is 15 to 30 foot candles. Also if a kennel owner had to create a diurnal light cycle for day and night lighting it would cost over \$18,500. Excessive cost for inhumane lighting would be a ridiculous proposal!

As you can see, some of the proposals in this legislation would create unhealthy or undesirable conditions for the dogs. For this reason, I encourage you to vote against the proposals and reevaluate the legislation. Thank you for your consideration and time.

Sincerely,

