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

October 22, 2009.

Dear IRRC Chairman Coccodrilli,

Please consider the below concerns I have pertaining to Section 28a of the Canine Health Board Standards for Commercial Kennels. Although I am sure they were written to improve the health and safety of dogs, I believe based on the below concerns that, if passed, these changes could actually do more harm than good.

One of my concerns is contained in Section 28a.2 which calls for mechanical ventilation to be implemented if the temperatures are above 85 degrees. The reality is that newborn puppies cannot maintain their own body temperatures until after 10 to 14 days of age. Supplemental radiant heat or infra red heat lamps are routinely used to create an average air temperature between 90 or 96 degrees Fahrenheit in the whelping area. This provides the best safety, health, and well-being of the young litter of puppies and is essential for their viability and survival. This mandate would create a separate violation for each puppy and mother and for a breeder to watch as puppies would die from hypothermia.

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.

I am also concerned that this proposed statute has exceeded their authority in mandating a mixture of natural and artificial lighting. The proposal requires a breeder to have a kennel with lighting of 50 to 80 foot candles when an average house has 12 to 20 foot candles and average commercial buildings have 15 to 30 foot candles. The proposed lighting would be unhealthy and inhumane for animals.

As you can see, these proposals may cause more harm and detriment to the animals in kennels. I know that everyone has good intentions in writing these changes, but more consideration needs to be made before passing these into law. Thank you for your consideration and time.

Truly yours,

Ervin Zimmerman
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