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

October 21, 2009

Dear IRRC Chairman Coccodrilli,

I have been made aware that there are proposed changes to Section 28a of the Canine Health Board Standards for Commercial Kennels. After reviewing these proposed changes I have concerns and would encourage you to vote "NO" to these changes. Please consider the following reasons.

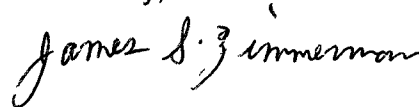
Under Section 28a.3, requiring lighting in a kennel to be between 50 – 80 foot candles would be harmful to animals exposed to this high intensity. A typical home is between 12 – 20 foot candles and commercial properties are between 15 to 30 foot candles. Forcing dogs to endure this intensity of lighting 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.

Also kennel owners would be suspect if their animals were to display characteristics such as panting, elevated temperatures, and nervous shivering. They might face fines or civil penalties for insufficient ventilation when in reality there might be a very natural explanation for the symptoms. Dogs pant when they are playing on a warm day, puppies have elevated temperatures when they get their inoculations, and the presence of strangers (the dog law inspectors) might cause nervous shivering in many 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 fail this assessment when in reality the kennel is sanitary.

As you can see, there are real concerns about this proposed legislation. I encourage you to vote "NO" to these proposals because I believe that, although designed to improve conditions, they may be detrimental to the existing well maintained kennels. Thank you for your consideration and time.

Sincerely,



James Zimmerman
84 Hickory Lane
Ephrata, PA 17522