

2785

**Jonas Esh
170 Truce Road
New Providence, PA 17560**

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

October 24, 2009

Dear IRRC Chairman Coccodrilli,

When laws and regulations are not clear, it is possible that misinterpretation of the laws can be detrimental. For this reason, I encourage you to oppose the Section 28a proposed changes to the Canine Health Board Standards for Commercial Kennels. I believe they are vague at times and not always designed for the best environment of the housed animals. Please consider the following.

In Section 28a.4 it is stated that "Solid flooring must be sloped to a drain that is free of debris." Again this is an unrealistic requirement. Pennsylvania's Bio Security Labs and USA's licensed inspected research labs would all fall these exorbitant and unreasonable standards set by these proposals! I do not believe these requirements are scientifically based and the Department has exceeded its authority.

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.

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.

As you can see, I believe it is absolutely imperative that you vote against these proposals. They are not going to improve conditions and in some cases, will actually make conditions worse.

Sincerely,

