

2785

IRRC Chairman Arthur Coccodrilli

333 Market Street, 14th Floor

Harrisburg, PA 17101

October 20, 2009

Dear IRRC Chairman Coccodrilli,

Please reconsider the proposed changes in regulations as written in Section 28a of the Canine Health Board Standards for Commercial Kennels. Although we are all concerned about the welfare of our animals, I am very concerned that some of the new proposals will actually be more harmful to the animals than beneficial to their health and welfare. Below are some of my concerns.

One of the main concerns is under Section 28a.3 where a kennel is to have an intensity of 50 to 80 foot candles. An average home lighting is 12 to 20 foot candles and even commercial lighting is only 15 to 30 foot candles. It would be inhumane to subject animals to lighting intensity as proposed by this regulation!

Another concern is under Section 28a.2 Ventilation. The required 8 – 20 air changes would be excessive. In a 40' x 100' building 10 air changes would require that 5300 cubic feet of air per minute be pushed through a facility. This would actually be in direct violation of the federal law that mandates that dogs must be protected from drafts in the primary enclosure and that the wind speed of the draft be measured at the shoulder of the dog.

Please also look at Section 28a.2 which concerns the temperature and the implementation of mechanical ventilation if the temperatures exceed 85 degrees. The reality is that puppies are unable to maintain their own body temperatures until after 10 to 14 days of age. Supplemental heat sources are routinely used to create temperature between 90 and 96 degrees. If this proposal was mandated it could mean the demise of many puppies due to hypothermia!

Please reconsider the approval of these mandates! Please examine each proposal as I believe that some of the recommendations would actually be more detrimental to the health and welfare of dogs than beneficial!

Sincerely,



Levi Brubacker

704 Kaiser Run Rd

Millmont, PA 17845