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

October 21st, 2009

Dear IRRC Chairman Coccodrilli,

As we all try to make conditions for animals healthier and beneficial, I am very concerned about the proposed changes to the Canine Health Board Standards for Commercial Kennels under Section 28a. These regulations which are intended to protect the health and welfare of the animals may in actuality cause more harm than good. Please consider the following points.

When a typical home has lighting of 12 to 20 foot candles and a commercial building has lighting of 15 to 30 foot candles, this proposal calls for a kennel to have lighting intensity of 50 to 80 foot candles. It would, indeed, be inhumane to expose animals to this intensity!

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.

In another part of the proposed changes, it is possible that kennel owners would face fines, civil penalties, and lifetime criminal charges if their dogs were to exhibit such things as dogs panting, elevated temperatures, nervous shivering, etc. which are all behaviors a dog may exhibit due to other reasons than poor ventilation. Kennel owners could falsely be accused of poor ventilation when in reality the cause could be a very natural reaction to other causes.

I feel these proposals should be examined carefully and encourage you to vote against the proposals that could harm dogs and cause kennel owners unnecessary expenditures. Thank you for your consideration.

Sincerely,

Melvin S. Nolt

Melvin Nolt
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