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

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October 21, 2009

Dear IRRC Chairman Coccodrilli,

Please consider the following points as you make your decision to vote for or against the proposed Section 28a to the Canine Health Board Standards for Commercial Kennels. I believe the proposed regulations are vague and unclear and therefore need to be revisited before approval is given to standards that could actually make conditions worse.

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.

In Section 28a.2.2, concerning relative humidity, the demands of this proposed humid control are well beyond the necessary levels to keep animals in a safe and healthy environment. The cost to establish this type of system is well beyond the normal cost of establishing safe humidity levels for animals. Well known breeders and established businesses will be forced to spend excessive amounts of money to bring their kennels to this required level. Please consider these well maintained businesses who are struggling in this difficult economy to keep their businesses going. They do not need to make unnecessary expenditures.

Also in Section 28a.2, the proposed changes indicate a required level of 10ppm for ammonia. Is this based on scientific research – is there scientific basis for this number?

In Section 28a.3, a shady area is required in an outdoor exercise area. According to the proposal, the area of shade should be large enough to protect all dogs utilizing the exercise area – this seems rather vague.

I believe that in Section 28a. 4.5, stating that all floors and drains must comply with the latest edition of applicable codes, is also vague – what code is this referring to?

Please consider these concerns and vote against these proposals as they are requiring kennel owners to go to unnecessary expenditures. We all know that in today's economy it is important to evaluate the expenditures necessary to bring conditions up to code. Keeping the safety and health of animals in mind, it is important that we look at the ramifications of new legislation.

Best regards,

J and J Kennel
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