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

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Coccodrilli  
October 23, 2009

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Dear IRRC Chairman Coccodrilli,

Thank you so much for all of your efforts to create healthy and safe conditions for the animals in our state. Pertaining to that industry, I would appreciate if you would consider the following concerns I have about the proposed changes in Section 28a of the Canine Health Board Standards for Commercial Kennels. I believe that after reading these concerns, you will understand why I am encouraging you to vote against these proposals.

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.

I am also concerned that this proposed statute has exceeded their authority in mandating a mixture of natural and artificial lighting. The proposal requires a breeder to have a kennel with lighting of 50 to 80 foot candles when an average house has 12 to 20 foot candles and average commercial buildings have 15 to 30 foot candles. The proposed lighting would be unhealthy and inhumane for animals.

In number 8 under Section 28a.2, a kennel owner is required to have between 8 – 20 air changes of 100% fresh air per hour in each room. The actuality is that when the temperature is under 40 degrees three complete air changes per hour are sufficient. Again, I feel the proposed mandate is excessive and not necessary for the health of the animals.

Another concern is that kennel owners may be falsely accused of poor ventilation when their puppies and dogs may exhibit conditions as outlined in Section 28a.2. Dogs may exhibit panting, elevated temperatures, shivering, etc. for a variety of very natural circumstances such as exuberant play on a hot day, recent inoculations, or even the approach of a stranger in the kennel. Kennel owners could be facing fines, civil penalties and lifetime criminal charges that would be unwarranted.

Thank you for your consideration of these concerns. Your time and effort in this matter is greatly appreciated. I hope after reconsidering you will vote against these proposals.

Sincerely,

Kri-Del Kennels  
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Columbia, PA 17512