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

RECEIVED
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OFFICE OF THE
IRRC CHAIRMAN

October 21, 2009

Dear IRRC Chairman Coccodrilli,

I would like you to consider the following concerns I have about the proposed changes to Section 28a of the Canine Health Board Standards for Commercial Kennels. I believe that although these proposals are designed to create better conditions, they are unnecessary to maintain proper kennels and will cause expenditures to kennel owners that in this economy may cause them to discontinue their well maintained businesses.

The requirement for what is referred to as proper ventilation would require breeders and owners to have 8 – 20 air changes of 100% fresh air per hour in each room of a facility that houses dogs. In order to achieve this level of ventilation, an owner would have to spend approximately \$118,000 to install the needed equipment. Then approximately an additional \$35,000 would be needed to fuel and maintain this additional equipment. These expenditures are outrageous and would in some cases put kennel owners out of business!

I believe that in Section 28a.2 the requirement to ensure that particulate matter form such as dander, hair and food is below 10 milligrams per meter cubed is unrealistic. All dog breeders know that puppies love to play in their bedding which is typically wood shavings or shredded paper. It would be impossible to meet the strict requirements of less than 10 milligrams per meter cubed. Again, this is unnecessary stress on owners.

Under Section 28a.3, the lighting requirement of 50 to 80 foot candles is excessive. Actually that intensity could be harmful to the dogs since average home lighting is 12 to 20 foot candles and even commercial lighting is 15 to 30 foot candles. Also if a kennel owner had to create a diurnal light cycle for day and night lighting it would cost over \$18,500. Excessive cost for inhumane lighting would be a ridiculous proposal!

Please consider these points and vote "NO" to the proposed changes. I believe that these proposals are not going to make conditions better in already well maintained kennels. Thank you for your consideration.

Sincerely,
Leon Martin
Leon Martin
423 Panorama Drive
Denver, PA 17517