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

REC-11
OCT 21 2009
11:00 AM

October 21, 2009.

Dear IRRC Chairman Coccodrilli,

As someone who is very interested in the safety and health of dogs and the necessity of keeping the best environment for the animals, I know that the government wants to require kennel owners to provide the best for their dogs. However, I am concerned about the proposed changes to Section 28a of the Canine Health Board Standards for Commercial Kennels. Please read my concerns below, and I think you will see why it is necessary to vote against these proposals.

I am 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.

Requiring 8 – 20 air changes would be excessive. This would actually be in violation to the Federal Law that mandates that dogs must be protected from drafts in the primary enclosure. In a 40' x 100' building the proposal would require that 5300 cubic feet of air per minute be pushed through a facility – certainly causing excessive drafting.

The statue calls for mechanical ventilation to be implemented if the temperatures exceed 85 degrees. If passed the law would make it illegal to have any dog in a kennel that is 86 degrees or higher. However, puppies need to have supplemental heat to create an air temperature between 91 and 96 degrees in the whelping area since they cannot maintain their own body temperatures for the first 10 to 14 days of their lives. This law would have puppies dying from hypothermia.

As you can see, although these proposals are to protect animals, they will actually be more detrimental than helpful. Many successful owners of well maintained kennels are concerned that these requirements will actually make their kennels less safe for their dogs. Please consider these concerns and vote against the proposals of Section 28a. Thank you for your time and consideration.

Truly yours, *Marvin & Mary Zimmerman*

Marvin & Mary Zimmerman
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