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FLOYD WEAVER

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

Oct. 21, 2009

Dear IRRC Chairman Coccodrilli,

Those involved in the dog industry and kennel ownership are very concerned about the proposed changes in Section 28a of the Canine Health Board Standards for Commercial Kennels. Although we realize it is everyone's intention to have the safest and healthiest environments for our animals, we feel that the requirements within this proposal are excessive and unnecessary. The requirements of these proposals will cause excessive expenditures in a time of economical stress. Hopefully after reading the below comments you will vote against these proposals.

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!

In addition to the expense of these changes, it is true that 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. And so, this is a cost item as well as an item for the best environment for the dogs.

In another part of the proposed standards is the requirement for Natural Lighting. The proposed requirements could cause an expenditure of over \$32,000 for a facility of 40' x 100' for architectural design, zoning permitting and inspections window and installation costs, and glazing of windows for diffraction of direct sunlight. This requirement far exceeds the necessary lighting for healthy animals!

Please vote "NO" to the proposed changes to Section 28a. We feel that these proposals are not benefitting the animals and certainly not cost effective.

These proposed rule making charges are not to the benefit of the animals and could cause undue harm. Thank you for your time and consideration.

Best regards,

Floyd J. Weaver

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