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

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October 22, 2009.

Dear IRRC Chairman Coccodrilli,

As I examined the proposed changes for Section 28a of the Canine Health Board Standards for Commercial Kennels, I became concerned that some of the proposed regulations are vague and perhaps impossible to achieve. Please consider the following concerns and consider voting against these proposals.

I believe that it is impossible to maintain a totally debris free floor, as required by Section 28a.4, since dogs may track bedding particles, hair follicles, food particles, defecation, nose or mouth residue and naturally falling dander into the kennel and each would independently constitute as debris on the floor. Therefore this is an unrealistic requirement.

Also in Section 28a.4, the requirement states that flooring may not be metal or any other material with high thermal conductance. I believe the Department is exceeding its authority. Pennsylvania's Bio Security Labs and USA's licensed inspected research labs would fail these unreasonable standards. Again, I believe that these proposals go beyond the reasonable and are not necessary.

In Section 28a.4 it states that a floor may be subject to microbial assessment, but it is possible that even after it is sanitized, if a dog urinates or defecates on the flooring it will show positive for microbial assessment from the digestive tract of the dog. Again, this is a difficult, if not impossible, requirement to meet.

I am concerned that dog breeders and kennel owners may be forced to give up their well maintained kennels due to the excessive requirements of these proposals. In today's economy it is difficult to keep businesses viable and only necessary and beneficial proposals should be considered. Please vote against these proposals based on the concerns I have expressed.

Truly yours, *Marian Hurst*

Marian Hurst  
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