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

October 22nd, 2009

Dear IRRC Chairman Coccodrilli,

My family and I are extremely concerned about the proposed changes to the Canine Health Board Standards for Commercial Kennels as outlined in Section 28a. There are many areas and changes that are unnecessary and would cause great expenditures for no real benefit and in some cases, would be harmful to the animals. Please reconsider your vote for this matter as you read the below concerns. I know that we are all in agreement that we want the best conditions for the welfare and health of our animals.

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!

Also this level of ventilation would violate the Federal Law that requires that dogs must be protected for drafts in their primary enclosure. A 40' x 100' building having 10 air changes an hour must push 5,300 cubic feet per minute through the facility – certainly causing drafts exceeding the federal law.

In Section 28a.2 I am also concerned that kennel owners would be accused of poor ventilation when their animals exhibited such symptoms as panting, elevated temperatures, nervous shivering, etc, when in reality these symptoms can be very common for a variety of other reasons. Inoculation boosters can cause elevated temperatures, playing outside on a warm day cause a dog to pant, and nervous shivering is often cause by the invasion of strangers such as dog law inspectors! These laws might be implemented in an unfair way!

Please reconsider the approval of these proposed changes! The changes need to be reevaluated to protect our dogs and also to allow kennel owners to remain viable businesses! Thank you for your consideration and the time you spend to evaluate these proposals.

Sincerely,

Matthew B. Stoltzfus
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Gap, PA 17527