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

RE: 50
10/23/09
11:57 AM

October 23, 2009

Dear IRRC Chairman Coccodrilli,

Please reconsider the approval of Section 28a of the Canine Health Board Standards! I know that these proposals are designed to make conditions for animals better, which is what we all want. However, there are requirements in these proposals that are unnecessary and would cause kennel owners and dog breeders to have such great expenditures that could put them out of business!

Concerning the proposed ventilation requirements, it is possible that owners would have to spend \$118,000 to bring their facilities to code and then another \$35,000 to maintain per year. This ventilation requirement would also create a drafty environment for the dogs which is direct violation to the federal code. High expenditures and unhealthy conditions certainly should indicate that this should not be approved!

Another concern is under Section 28a.3 where a kennel is to have an intensity of 50 to 80 foot candles. An average home lighting is 12 to 20 foot candles and even commercial lighting is only 15 to 30 foot candles. It would be inhumane to subject animals to lighting intensity as proposed by this regulation!

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 against these proposals as they may cause insurmountable expenditures to breeders and kennel owners for unnecessary requirements and in some cases, unhealthy environments.

Sincerely,

Glenn + Miriam Fox

Miriam & Glenn Fox
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