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

October 21st, 2009

Dear IRRC Chairman Coccodrilli,

I am aware that there are proposed changes to the Section 28a Canine Health Board Standards for Commercial Kennels. I have concerns that, although designed to improve conditions, these proposals could actually cause some kennels to have unsafe and unhealthy environments. Please consider the following.

Young puppies are unable to maintain their own body heat and therefore require supplemental heat sources to achieve air temperatures between 91 and 96 degrees. And yet, the new proposal requires kennel owners to keep a kennel at less than 86 degrees. I believe that the Department exceeds their authority to create a law which would make it illegal to keep puppies at a safe temperature.

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!

Under Section 28a.3, the lighting requirement of 50 to 80 foot candles is excessive. Actually that intensity could be harmful to the dogs since average home lighting is 12 to 20 foot candles and even commercial lighting is 15 to 30 foot candles. Also if a kennel owner had to create a diurnal light cycle for day and night lighting it would cost over \$18,500. Excessive cost for inhumane lighting would be a ridiculous proposal!

Please vote "NO" to these proposals because as you can see, these changes could actually cause conditions to become unhealthy and unsafe for the dogs housed in these enclosures.

Sincerely, *Reuben M. Zook*