

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

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October 21st, 2009

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Dear IRRC Chairman Coccodrilli,

I am extremely concerned about the proposed changes to the Canine Health Board Standards for Commercial Kennels, particularly Section 28a. Although I am sure that these proposals were well intended, I believe that some of the proposals should be reconsidered for their impact on the animals. Please consider the following and vote against these proposals.

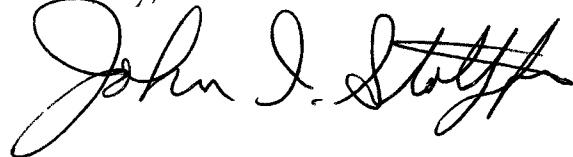
The Department's regulatory authority is exceeded when proposed rulemaking requires 50 to 80 foot candle. An average home is 12 to 20 foot candles and commercial facilities are 15 to 30 foot candles. It would be inhumane to expose animals to the intensity of 50 to 80 foot candles! This proposal is in direct violation to the Federal Animal Welfare Act!

Additionally the economic impact on a 40' x 100' facility for the purchase of light fixture units, installation, circuit panel, and additional circuit breaker installation, electrical engineering design, zoning permitting, and inspections, full spectrum fluorescent tubes and shipping plus having a diurnal light cycle for day and night would cost over \$18,500! This type of expenditure would be impossible for some owners plus it would be harmful to the animals!

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!

The requirements of these proposals would cause kennel owners and breeders unnecessary expenditures as well some of the requirements could be harmful to the animals housed in the facilities. Please vote against these proposals!

Sincerely;



John Stoltzfus
774 Evans Road
Narvon, PA 17555