

*John Zook*  
*313 Cabin Drive*  
*Ephrata, PA 17522-8622*

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

# 2785

October 23, 2009.

Dear IRRC Chairman Coccodrilli,

As an individual extremely interested in the proper maintaining of kennels, I am concerned about the currently proposed Section 28a changes to the Canine Health Board Standards for Commercial Kennels. I believe that these proposals, although well intended, have the potential to force owners of well maintained and well run kennels to shut down their businesses due to excessive expenditures necessary to meet these requirements. Please consider the comments below.

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 big mistake!

Also kennel owners would be suspect if their animals were to display characteristics such as panting, elevated temperatures, and nervous shivering. They might face fines or civil penalties for insufficient ventilation when in reality there might be a very natural explanation for the symptoms. Dogs pant when they are playing on a warm day, puppies have elevated temperatures when they get their inoculations, and the presence of strangers (the dog law inspectors) might cause nervous shivering in many dogs.

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!

Please consider these comments and vote against the proposed changes in Section 28a. Kennel owners who maintain their kennels in the best and healthiest manner will appreciate a negative vote. Thank you for your consideration and time.

Sincerely, *John Z. Zook*