

Totally Pets Incorporated  
7618 City Ave.  
Philadelphia, PA 19151

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

\*2985

PROPOSED  
SECTION 28A  
CANINE HEALTH BOARD  
STANDARDS FOR  
COMMERCIAL  
KENNELS

October 24th, 2009

Dear IRRC Chairman Coccodrilli,

I am opposed to the approval of the Section 28a Canine Health Board Standards for Commercial Kennels. Please consider the following points and consider voting against these proposals which are, at times, detrimental to the health of the animals in these facilities.

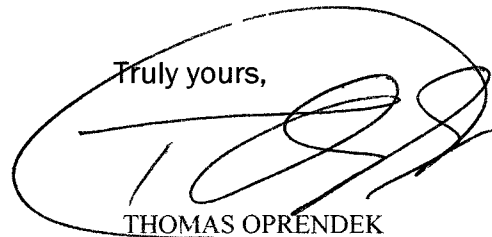
Requiring lighting in an animal facility to be 50 to 80 foot candles is ridiculous when lighting in the average home is only 12 to 20 foot candles and even commercial properties are 15 to 30 foot candles. Actually requiring that high intensity lighting in a dog facility is inhumane!

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!

In addition to the expense of these changes, it is true that requiring 8 - 20 air changes would be excessive. This would actually be in violation to the Federal Law that mandates that dogs must be protected from drafts in the primary enclosure. In a 40' x 100' building the proposal would require that 5300 cubic feet of air per minute be pushed through a facility - certainly causing excessive drafting. And so, this is a cost item as well as an item for the best environment for the dogs.

I strongly believe these proposals, although I am sure designed to improve conditions, have the potential to create unsafe and unhealthy environments for our animals. Please vote "NO" to these proposals!

Truly yours,



THOMAS OPRENDEK  
PRESIDENT