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10/23/09
2785

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

October 23, 2009.

Dear IRRC Chairman Coccodrilli,

With extreme concern, I am writing this letter to you so that you will please vote against the proposed changes to the Canine Health Board Standards for Commercial Kennels in Section 28.a. I believe that the proposals are vague and could potentially make conditions worse instead of better. I know that you and others would not want to pass regulations that would be harmful to our animals.

In Section 28a.4, solid flooring is approved for use. I feel that this does not provide the most sanitary flooring environment for dogs. I would like to see this change eliminated from the proposal. I also believe that in the same part, numbers 6 and 8 may be in conflict with each other since it is possible that sealed concrete, painted concrete, epoxy flooring, sealed wood, textured and sealed tile (which are coated materials) could potentially be toxic to some dogs.

Also, under Section 28a.3, requiring lighting in a kennel to be between 50 – 80 foot candles would be harmful to animals exposed to this high intensity. A typical home is between 12 – 20 foot candles and commercial properties are between 15 to 30 foot candles. Forcing dogs to endure this intensity of lighting would be inhumane. The proposal also calls for lighting to be 50 to 80 foot candles during the day and 1 – 5 foot candles on a night cycle. After researching the cost to achieve this level of lighting with a diurnal light cycle, I believe the costs could be over \$18,500. Besides the inhumanity to animals, the exorbitant cost may cause good kennels and breeders to give up their businesses.

I also believe there are parts of this proposal that are vague and allow for too much interpretation. For example, section 28a.3 states that an outdoor exercise area should provide an area of shade large enough to protect all dogs utilizing the exercise area. This statement is vague and needs more precise detail.

Please consider these concerns and vote against the proposed changes. Although we all work to keep our kennels the best that they can be, I feel these newest proposals are possibly detrimental to the animals and require exorbitant expenditures for unnecessary requirements. Thank you for your consideration and time.

Truly yours,
Benni E Kauffman