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

#2785

10/25/09
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Oct. 25, 2009

Dear IRRC Chairman Coccodrilli,

I know that we are all trying to make conditions in commercial kennels healthier and safer for our animals. Those in the industry and legislators endeavor to control the environment in the best way possible. However, I would like you to consider the comments below and vote against the proposed changes to Section 28a of the Canine Health Board Standards for Commercial Kennels. I believe that after reading these comments you will agree that these proposals will not create better conditions.

Under the ventilation points, the proposed standard is to implement mechanical ventilation if temperatures exceed 85 degrees. However, the fact is that newborn puppies cannot maintain their own body temperatures and require supplemental heat sources to create an air temperature between 90 and 96 degrees. Puppies would die of hypothermia if this law were to pass and obeyed!

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!

In another part of the proposed changes, it is possible that kennel owners would face fines, civil penalties, and lifetime criminal charges if their dogs were to exhibit such things as dogs panting, elevated temperatures, nervous shivering, etc. which are all behaviors a dog may exhibit due to other reasons than poor ventilation. Kennel owners could falsely be accused of poor ventilation when in reality the cause could be a very natural reaction to other causes.

Please consider voting against these proposals as we all want to provide the very best for our animals!

Best regards,

Bonnie Hackett
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