

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

#2785

October 23, 2009

Dear IRRC Chairman Coccodrilli,

Please consider the following points as you make your decision to vote for or against the proposed Section 28a to the Canine Health Board Standards for Commercial Kennels. I encourage you to vote "NO" to these proposals! I believe that these proposals will not be safe for our animals. Please consider the following in making this decision.

Drafts in a kennel are to be avoided if possible and a Federal Law mandates that dogs be protected from drafts in the primary enclosure. However Section 28a.2 dealing with ventilation actually requires 8 – 20 air changes. This would be excessive and could cause excessive drafts in the enclosure. For example, in a building 40' x 100', if there were even 10 air changes it would require 5300 cubic feet of air per minute to be pushed through the building. This would most certainly cause drafting.

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 that in Section 28a.2 the requirement to ensure that particulate matter form such as dander, hair and food is below 10 milligrams per meter cubed is unrealistic. All dog breeders know that puppies love to play in their bedding which is typically wood shavings or shredded paper. It would be impossible to meet the strict requirements of less than 10 milligrams per meter cubed. This is unnecessary stress on owners.

Again, I ask you to vote "NO" to these proposals, as I believe; they will be detrimental to the animals housed in these facilities. Thank you for your time and consideration.

Sincerely,



Vision Kennel  
3232 Limestone Road  
Cochranville, PA 19330