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

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10/22/09

October 22nd, 2009

Dear IRRC Chairman Coccodrilli,

I would like to express concern about the proposed changes in Section 28a of the Canine Health Board Standards for Commercial Kennels. There are some points in these proposals that could unnecessarily cause great expenditures to kennel owners and breeders. In some cases, it might cause these good breeders and owners to give up their businesses. I believe that some of the proposals are actually impossible to achieve to the demand of the proposed law. Please consider the following.

The ventilation requirement as proposed by these changes could cost owners approximately \$118,000 plus an additional \$34,000 in operating costs. The requirement of 8 - 20 air changes of 100% fresh air per hour in each room is unnecessary because in actuality when the temperature is below 40 degrees three complete air changes per hour is sufficient.

This requirement of 8 - 20 air changes also violates the Federal Law covering Animal Welfare which mandates that dogs must be protected from drafts in their primary enclosure. A 40' x 100' building having 10 air changes an hour must push 5,300 cubic feet per minute through the facility. This requirement would certainly create drafts which would be unhealthy for the dogs housed in the facility.

I also believe that it is impossible to maintain a totally debris free floor as required in Section 28a.4. Dogs may track bedding particles, hair follicles, food particles, defecation, nose or mouth residue or naturally falling dander in the kennel and any of these would constitute as debris on the floor. It would be impossible to eliminate all of the above and would certainly cause undue stress on a kennel owner to achieve.

Please vote against these proposals as I believe they are unnecessary, cause great expenditures that are not needed, and also in some cases would cause unhealthy conditions for the animals.

Sincerely,


The Service Team, Inc/ Country Junction
6565 Interchange Road
Lehighton, PA 18235