

2785

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

RECEIVED

OCT 22 17 11 2009

October 22, 2009.

Dear IRRC Chairman Coccodrilli,

I would greatly appreciate if you would consider the below concerns about the proposed changes to the Canine Health Board Standards for Commercial Kennels under Section 28a. I believe that these proposals, although designed to make conditions healthier for the animals, are beyond the necessary requirements to have a healthy and safe environment and also, in some cases, might create unsafe conditions. I hope that you will vote against the proposed changes.

Young puppies are unable to maintain their own body heat and therefore require supplemental heat sources to achieve air temperatures between 91 and 96 degrees. And yet, the new proposal requires kennel owners to keep a kennel at less than 86 degrees. I believe that the Department exceeds their authority to create a law which would make it illegal to keep puppies at a safe temperature.

Proposed lighting for a kennel is 50 to 80 foot candles. In reality it would be inhumane to expose animals to this high intensity, when the average home is only 12 to 20 foot candles.

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.

My concerns are based on two main areas. One is that some of the proposed requirements are actually unhealthy for the animals and secondly that some of the requirements are excessive and would cause excessive expenditures for kennel owners. These are quality kennel owners who certainly want the best for their animals. However, in some cases, these additional and unnecessary requirements might be so excessive they would cause some to close their doors. Today's economy is difficult enough without the government demanding codes beyond the necessary. Thank you for your consideration and I hope you will vote against these proposals.

Sincerely,

David a Zook

David Zook
315 Cabin Dr
Ephrata, PA 17522