

Pauline Easley

From: [REDACTED]
Sent: Saturday, June 11, 2016 11:41 AM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

In particular, I respectfully urge the Department to propose rules to afford breeding dogs more cage space, require a solid resting surface and ban the unsafe and unsanitary practice of stacking dogs' cages on top of one another. Breeding dogs typically spend their entire lives in these cages so these modest improvements are critical to ensuring a basic standard of wellbeing and safety for them.

Thank you for your consideration.

Sincerely,

Janet Garrison

Pauline Easley

From: [REDACTED]
Sent: Saturday, June 11, 2016 11:37 AM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

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Thank you for your consideration.

Sincerely,

Laura Alleman

Pauline Easley

From: [REDACTED]
Sent: Saturday, June 11, 2016 11:34 AM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

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Thank you for your consideration.

Sincerely,

Ali Iverson

Pauline Easley

From: [REDACTED]
Sent: Saturday, June 11, 2016 11:29 AM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

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Thank you for your consideration.

Sincerely,

V Walker

Pauline Easley

From: [REDACTED]
Sent: Saturday, June 11, 2016 11:28 AM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

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Thank you for your consideration.

Sincerely,

Dana Jenkins

Pauline Easley

From: [REDACTED]
Sent: Saturday, June 11, 2016 11:19 AM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

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Please help protect these defenseless animals. They are living being with feelings.

Thank you for your consideration.

Sincerely,

Cristina Badillo

Pauline Easley

From: [REDACTED]
Sent: Saturday, June 11, 2016 11:17 AM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

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Thank you for your consideration.

Sincerely,

Sofia Finch

Pauline Easley

From: [REDACTED]
Sent: Saturday, June 11, 2016 11:16 AM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

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Thank you for your consideration.

Sincerely,

Ritu Radhakrishnan

Pauline Easley

From: [REDACTED]
Sent: Saturday, June 11, 2016 11:10 AM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

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Please stop this inhumane practice.

Thank you for your consideration.

Sincerely,

Diane Young

Pauline Easley

From: [REDACTED]
Sent: Saturday, June 11, 2016 11:07 AM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

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Thank you for your consideration.

Sincerely,

Sharon Locher

Pauline Easley

From: [REDACTED]
Sent: Saturday, June 11, 2016 11:05 AM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

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Please act on this immediately!

Thank you for your consideration.

Sincerely,

Jamie Mckittrick

Pauline Easley

From: [REDACTED]
Sent: Saturday, June 11, 2016 9:10 AM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

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Animals are a great gift from God that should be cherished. Dogs are wonderful companions and deserve to be treated humanely.

Thank you for your consideration.

Sincerely,

David Porter

Pauline Easley

From: [REDACTED]
Sent: Saturday, June 11, 2016 7:41 AM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

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Thank you for your consideration.

Sincerely,

Ken Murray

Pauline Easley

From: Gina Moraz [REDACTED]
Sent: Saturday, June 11, 2016 7:24 AM
To: Erule Comments
Subject: ASPCA Comments: Rule Review of Title 16, Texas Administrative Code, Chapter 91. Dog or Cat Breeders
Attachments: ASPCA Comments - Licensed Breeders Rules Review FINALdocx.docx; Attachment 1 wire flooring fact sheet.docx CW.docx; Attachment 2 foot-paw injuries from reports CW.docx; Attachment 3 care_for_dogs_model_act_and_regs_backgrounder.pdf; Attachment 4 cage stacking fact sheet.docx

To Whom It May Concern:

On behalf of the American Society for the Prevention of Cruelty to Animals and our more than 151,000 Texas members, thank you for the opportunity to submit comments on the review of the Dog or Cat Breeders Program Rules (Title 16, Texas Administrative Code, Chapter 91) established pursuant to Title 4, Chapter 802 of the Occupations Code. Attached please find our comments and four attachments.

Sincerely,

Gina K. Moraz, Esq.
Manager, Puppy Mills Campaign
Strategy & Campaigns
Anti-Cruelty Group

ASPCA
520 8th Avenue, 24th floor
New York, NY 10018

P: (646) 438-3458

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Chloë Waterman
State Affairs,
Government Relations

600 Pennsylvania Ave, SE
Washington, D.C. 20003

(202) 621-6682
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June 12, 2016

Ms. Pauline Easley, Legal Assistant
Texas Department of Licensing and Regulation, General Counsel's Office
P.O. Box 12157
Austin, TX 78711

Re: Rule Review of Title 16, Texas Administrative Code, Chapter 91. Dog or Cat Breeders

Dear Ms. Easley,

On behalf of the American Society for the Prevention of Cruelty to Animals and our more than 151,000 Texas members, thank you for the opportunity to submit comments on the review of the Dog or Cat Breeders Program Rules (Title 16, Texas Administrative Code, Chapter 91) established pursuant to Title 4, Chapter 802 of the Occupations Code.

First, we would like to thank the Department for its efforts over the past five years in establishing the program and enforcing the Dog or Cat Breeders Law. We believe that licensing and routinely inspecting breeders has led to substantial improvements for both animal welfare and consumers. The majority of the breeders licensed under the Program do not hold licenses from the United States Department of Agriculture (USDA), meaning that Texas Department of Licensing and Regulation (TDLR) inspections are the only mechanism by which they are held accountable for the care the breeding dogs are receiving and the health and well-being of puppies that ultimately become part of Texas families. Plus, the Animal Welfare Act regulations and enforcement by the USDA are wholly inadequate; it is critical that TDLR has oversight over all commercial dog breeding facilities in Texas. The Department's inspections have led to numerous citations prompting improvements to animal welfare as well as reports of cruel treatment.

To improve upon these successes, it is essential that the Department expand upon its standards of care for breeding dogs, particularly with regard to the animals' enclosures. The Department is vested with promulgating rules to "ensure the overall health, safety and well-being of each animal" (Title 4, Chapter 802, Subsection E of the Occupations Code). To fulfill this requirement, substantial improvements must be made to the minimum standards. Given their importance, dog enclosures are a key place to focus at

About the ASPCA®

Founded in 1866, the ASPCA® (The American Society for the Prevention of Cruelty to Animals®) is the first animal welfare organization in North America and serves as the nation's leading voice for animals. More than two million supporters strong, including more than 151,000 Texas members, the ASPCA's mission is to provide effective means for the prevention of cruelty to animals throughout the United States. As a 501(c)(3) not-for-profit corporation, the ASPCA is a national leader in the areas of anti-cruelty, community outreach and animal health services. We have one of the nation's largest animal grants programs, and we awarded over \$5 million to local Texas animal welfare organizations in recent years.

this time. Under the current rules, breeding dogs can spend their entire lives in cramped, wire-floored cages, stacked on top of other dog cages. These conditions are cruel, unsafe, and unsanitary. The following three recommendations with regard to enclosure standards found in Section 91.104 are necessary to align the Rules with the statutory requirement to provide for the health, safety, and well-being of the animals.

A. Wire or Wire Mesh Flooring

As currently written, Section 91.104(1)(B)(x) allows for floors to be constructed entirely of metal wire or wire mesh and does not require a solid surface or resting board for the dogs. Wire and wire mesh flooring have a negative impact on the health, safety, and wellbeing of the animals. This type of flooring can cause severe physical and emotional distress for dogs who often spend their entire lives in these enclosures. Dogs forced to live on wire flooring for long periods of time frequently suffer from an array of foot and toe injuries, including chronic, painful sores and lesions, infections and cysts between the toes, broken bones, toenails that curl into the paw pads from lack of pressure on the nail, and toenails being ripped out when they get caught on the wire. Wire flooring is not comfortable so dogs avoid normal behaviors like resting or lying down, forcing them to stand for unnaturally long periods of time, which can lead to anxiety, depression, and other behavioral problems.

Despite the current Texas regulations requiring that the floors must be constructed in a manner that does not allow the dogs' feet to pass through any openings in the floor, in practice, dogs' feet falling through the wire is a major problem. Any opening that is big enough for feces to fall through is big enough for a paw or toe to fall through. If a dog attempts to pull a limb back through the wire, it can cause deep lacerations and even broken bones. USDA inspection reports consistently demonstrate these physical injuries to dogs as a result of the use of wire flooring, even wire that is coated with plastic or fiberglass.¹ There is ample evidence (both photographic and in written inspection reports) that dogs are often 'balancing' on the wire with their feet splayed under the pressure of their own body weight, which can cause painful sores and cysts between the dogs' toes.²

Wire flooring is not more sanitary than solid flooring, and in many cases is less so. Feces do not always readily fall through wire mesh. It falls through when the dogs grind it through the wire with their feet, which creates unsanitary conditions. Both the dogs themselves and the wire become caked in feces and debris. There is ample photographic evidence from the USDA showing feces sitting on top of wire flooring.³

Further, the current state standards require that the floors of the indoor housing facilities, and any other surfaces in contact with the animals, be impervious to moisture. However, wire floors are not impervious to moisture as wire can rust and weaken or break, exposing sharp edges to the animals and increasing their risk for injury. In the case where feces has been caked into the wire flooring, water causes pools of urine and feces to accumulate in the cages leading to the spread of disease.

¹ See photographic evidence of wire floors and injured paws due to wire or wire mesh flooring from USDA inspection reports in Attachment 1.

² See examples from USDA inspection reports and associated photographs of sores, cysts and swelling of dogs' paws and toes in Attachment 2.

³ See Attachment 1.

Moreover, wire flooring is more difficult to keep clean. The current sanitation standards require licensed breeders to clean primary enclosures daily or as often as necessary to prevent an excessive accumulation of feces and food waste, to prevent soiling of animals contained in the primary enclosures, and to reduce disease hazards. However, these problems are difficult to manage with wire flooring. On the other hand, partial or full solid flooring, as recommended by the American Veterinary Medical Association (AVMA),⁴ is less likely to create unsanitary conditions. It is actually easier to clean solid flooring than it is to remove feces on wire strand flooring. Solid flooring along with daily removal of waste would provide more sanitary conditions than wire flooring where feces is encrusted on the floor and cannot be removed without substantial effort.

In fact, at the January 4, 2012 Advisory Committee meeting, members agreed that solid or partial solid flooring was in the best interest of the animals based on the AVMA recommendations and standards. We agree and believe that solid flooring is more comfortable for the dogs, allowing them to move around and rest more normally. At the very least, we recommend animals be provided with a solid floor or resting board that covers at least 50 percent of the floor space in the enclosure. Where cage flooring is not entirely solid, the remaining floor space should comply with Section 91.104(1)(B)(x).

We therefore recommend that Section 91.104(1)(B)(xi) be changed as follows:

- (xi) Provide a *resting board or solid surface large enough* to allow each dog or cat to turn about freely, to stand, sit, and lie in a comfortable, normal position, and to walk in a normal manner, *without its body being in contact with the ceiling or any side of the enclosure. At least 50 percent of the floor space in the enclosure must be covered by a resting board or be a solid floor surface. The resting board must be of a non-toxic, durable, solid material that is impervious to moisture; easily cleaned and not susceptible to being chewed or destroyed by the animal.*

B. Cage Space

Small cage size, coupled with overcrowding found in commercial breeding facilities, even further restricts dogs comfort and natural movement, sometimes causing fights and restricting access to water and food.

The current cage space requirement in Section 91.104(3)(A)(i) is as follows:

- Each dog housed in a primary enclosure (including weaned puppies) must be provided a minimum amount of floor space, calculated as follows: Find the mathematical square of the sum of the length of the dog in inches (measured from the tip of its nose to the base of its tail) plus 6 inches; then divide the product by 144. The calculation is: (length of dog in inches + 6) x (length of dog in inches + 6) = required floor space in square feet.

We suggest the following change to the current equation for determining proper cage size:

- All dogs over twelve weeks of age housed in primary enclosures must be provided with a minimum amount of floor space in the primary enclosure, calculated as follows: Find the mathematical square of the sum of the length of dog in inches, measured in a straight line from the tip of its nose to the base of its tail, plus six inches, then divide the product by 144, **then multiply by two.** The calculation is: (length of dog in inches + 6) (length of dog in inches + 6)

⁴ See AVMA Model Bill and Regulations to Assure Appropriate Care for Dogs Intended for Use as Pets in Attachment 3.

=required floor space in square inches. Required floor space in inches/144 x 2= required floor space in square feet.⁵

Our recommendation would double the cage size for animals in licensed breeding facilities. Even with doubling the cage size, these animals will still be confined to a small space, some for their entire lives. This additional cage space will allow the dogs to move about a bit more freely and provide them with the opportunity for more normal, comfortable postural movements.

C. Cage Stacking

Section 91.104(1)(A) and (3)(D) allow for the stacking of primary enclosures not more than three high and require an impervious barrier between stacked rows. Cage stacking is a common practice in commercial breeding facilities as it allows the breeder to house the most animals in the smallest amount of space. Barriers between rows are commonly used, but these partitions frequently overflow, causing urine, feces and food waste to fall onto the dogs in the bottom rows.⁶ Stacking is an unnatural living environment for dogs. Stacking can block lighting to the lower cages, causing dogs to live in total darkness, sometimes for their entire lives. Cages are often stacked so high that daily observation of the dogs on the top row and the dogs down low is very difficult, and medical or behavioral issues may be overlooked or harder to detect. They also make daily care, and particularly cleaning, more difficult. If a caretaker needs to climb on a ladder to clean the back of the cage, it is unlikely to be done, at least not regularly.

Stacking can also prevent the opportunity for daily exercise, as required in Section 91.106(a). If the cages are stacked, they do not let out to the ground level so the dogs will likely never touch the actual ground. Even if the dogs were removed for exercise, this could be a difficult task and dogs in the top rows could fall or be dropped, causing injury. Cage stacking also hinders the flow and circulation of air. The atmosphere in commercial facilities is usually poisoned with toxic high levels of ammonia, which causes eye irritation and chronic respiratory disease in many of the dogs so air flow is crucial. For the above reasons, we recommend that cage stacking be prohibited altogether.

We recommend the following change to Section 91.104(3)(D):

- Primary enclosures *for dogs* may not be stacked *one on top of another*.

In closing, thank you again for the opportunity to provide comments on the Rules on behalf of our Texas members. Please do not hesitate to reach out if you have any questions about our positions or need further information.

Sincerely,



Chloe Waterman

⁵ This equation has been adopted into current law by the state of Pennsylvania in Section 459-207 of the PA Dog Law.

⁶ See photographic evidence of cage stacking taken by the USDA in Attachment 4.

Attachment 1: Wire Flooring in Commercial Kennels

Many commercial breeding facilities house dogs in cages with wire mesh flooring. This type of flooring can cause severe physical and emotional distress for dogs who often spend their entire lives in these enclosures. USDA inspection reports consistently demonstrate physical and emotional injuries to dogs as a result of the use of wire flooring. Wire flooring can:

Cause painful sores and inter-digital cysts, swelling, lesions, and masses, which can disrupt the dogs' normal gait and cause skeletal problems.

Lead to overgrown nails becoming embedded in the dog's paw pads or being torn out when they become caught in or around the wire flooring.

Lead to injuries from paws slipping through holes in the wire flooring, immobilizing the dogs entirely and sometimes causing severe injury.

Lead to the accumulation of feces and other waste, often resulting in shockingly unsanitary conditions



USDA License # 43A5686, Harvey Miller, 11/29/10 inspection



USDA License # 43A2556, Antech Inc., 7/10/13 inspection



USDA License # 43A5541, Eli Miller, 7/20/11 inspection



USDA License # 42A1420, David & Joane Cline, 3/8/11 inspection



USDA License # 57R0116, Merial Ltd, 9/7/10 inspection



USDA License # 33A0525, Amos & David Diener, 6/11/13 inspection



USDA License # 48B0269, Melvin Rife, 1/26/11 inspection



USDA License # 41A0298, S. Glenis Viken, 2/16/11 inspection

USDA Inspection Reports and Photos Citing Physical Injuries to Dogs' Paws and Toes

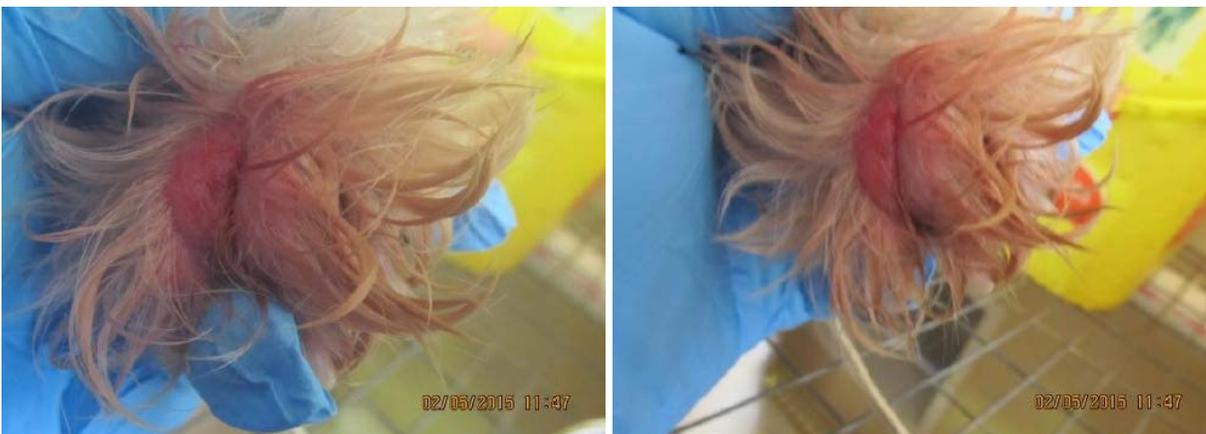
USDA License Number: 74-A-1475 (Texas), Inspection Report Date: May 25, 2014

“Three puppies were housed in a wire primary enclosure in the nursery that was placed on top of an empty and unused wire enclosure. One of the exterior sides of the empty enclosure near the top and adjacent to the puppies was covered in a thick accumulation of animal hair.”

“A primary enclosure containing 5 puppies had an elevated metal rack used for flooring with square openings large enough for the puppies' feet and toes to pass through. During this inspection the puppies' toes and feet were seen passing through the openings in the floor. Orthopedic fractures and other injuries may occur if the toes, feet or legs become trapped in the openings.”

USDA License Number: 43-A-5385, Inspection Report Date: February 5, 2015

“There was a female Maltese that was limping and favoring her left rear paw. Upon closer observation there was a raised, reddened, nodule-like lesion between the two middle toes on the left rear paw. The lesion was approximately $\frac{3}{4}$ inch by $\frac{1}{4}$ inch in size. While trying to more closely observe the paw, the dog would frequently pull its leg back toward its body. According to the licensee, she was not aware of the lesion until the inspector pointed it out.”



USDA License Number: 43-A-5688, Inspection Report Date: October 31, 2013

“There was an adult female pug that had red, swollen tissue between the toes of her right hind foot. The enlarged tissue had a split in its surface that was draining. Inflamed and swollen tissue may be the indication of infection and can be painful to the animal”



USDA License Number: 31-A-0434, Inspection Report Date: September 18, 2013

“Male black and white Shih Tzu has reddish brown fluid on his right rear foot. Between his toes on that foot is a lesion that is mildly swollen, pink, and moist. An infection may be present.”



USDA License Number: 43-A-1843, Inspection Report Date: December 4, 2013

“There was a male Maltese with a raised lesion between the toes on the left front paw. The fur surrounding the lesion appeared wet with a red blood-like material. The lesion was blue to grey to purple and approximately ½ inch in diameter.”



USDA License Number: 35-A-0332, Inspection Report Date: June 4, 2013

“A 3 year-old female bichon cross was observed limping on the front left foot (non-weight bearing). It is reported that she has not been limping until today. On close examination of the affected leg, it was observed that between her digits (toes) she has approximately 1x1 inch round area that is raised, red, and appears to be fluid filled.”



USDA License Number: 41-A-0248, Inspection Report Date: February 13, 2014

“Four dogs were observed to have swollen sores on the tops of their feet between their toes that were red, raised, and hairless. The following dogs were affected on the following feet:

- A husky on both hind feet; this dog was observed to have a mild limp on the right rear leg.
- A rat terrier, on the right rear foot.
- A rat terrier, on the right front foot.
- A beagle, on the right front foot.”





MODEL BILL AND REGULATIONS TO ASSURE APPROPRIATE CARE FOR DOGS INTENDED FOR USE AS PETS

Background and Context

The issue

Dogs that are bred and intended to be kept as pets require a basic standard of care for their own well being and to ensure they possess the temperament and good health necessary to become successful companion animals. The good news is that most facilities meet or exceed this level of care. Unfortunately, there are also substandard facilities that breed and keep dogs under deplorable and unsanitary conditions.

During the past few years, many states have considered passing bills regulating those who breed and/or retail dogs in an effort to address these substandard facilities. To assist state and local governments in designing effective policies to enforce reasonable welfare standards for breeder and retailer operations, the American Veterinary Medical Association (AVMA) has developed model legislation and accompanying regulations.

Our model legislation and regulations are intended to serve as guidance for governments considering the creation or augmentation of policies regulating dog breeders and retailers. The following information is provided to explain the rationale and scientific evidence behind the ideas set forth in our model.

Who would be regulated?

Currently, the basic welfare needs of dogs in certain facilities are assured by compliance with the federal Animal Welfare Act (AWA). However, dogs in many breeding and retail operations are left unprotected, including those in operations that sell/distribute dogs directly to the public. Thus, the goal of our model bill and accompanying regulations is to provide assurance of acceptable animal care for dogs currently not covered by the AWA or similar regulations and to ensure that all dogs sold/distributed to the public are protected, irrespective of facility type (i.e., dogs are deserving of a minimum standard of care whether bred/raised/distributed by breeders, shelters or animal control facilities).

To maximize the allocation of limited resources, the models define two groups for coverage: 'high-volume dog breeder' and 'high-volume dog retailer.' A 'high-volume dog breeder' is defined as one who whelps six or more litters a year. This classification is in accord with the American Kennel Club's definition of a high-volume breeder,¹ and has been used in both current and proposed legislation.^{2,3,4} A 'high-volume retailer' is described as one who sells or transfers ownership of more than fifty dogs during any calendar year. Use of these definitions helps to focus limited resources on the facilities housing a large proportion of the dogs raised and/or made available for use as pets.

How are the model bill and regulations designed?

There are two general types of assurance standards: engineering standards and performance standards. Engineering standards are resource-based and generally include rigid technical specifications addressing the physical environment. For example, our model sets a minimum calculable standard for the amount of cage space a dog must be provided. Performance standards are animal-based and measure how a dog's welfare is impacted by a given environment. Under a performance standard, if the welfare needs of the dogs are met, as evidenced by their general physical and behavioral condition, then the facilities are sufficient. For example, waste disposal systems are sufficient if enclosures are kept clean, and if dogs are kept dry and their coats are free of debris.

The model bill and its accompanying regulations are designed to ensure the welfare needs of individual dogs are met, and rely largely on performance standards. We believe performance standards better measure a dog's well-

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being, are flexible enough to support a positive outcome in a diversity of operations, and allow for the use of professional judgment in their application. This is desirable as both small and large operations can and must provide acceptable care for dogs. Furthermore, performance standards allow consideration of a dog's breed, age, sex, reproductive status, and any other factors impacting its individual welfare needs. Performance standards are also currently, widely, and effectively used in the regulation of care for dogs in research institutions.⁵ It is envisaged that these standards should never be applied in a way that meets the letter of the standard, but is detrimental to the well-being of the dog. However, where discretion is exercised to modify requirements or exempt a dog from their application, a clear justification should be provided that has as its basis *the welfare of the dog*. Whenever possible, necessary steps should be taken to remove the need for the exemption. For example, a dog may need to be individually housed until it is socialized or a compatible social group can be found. If this is not possible, the dog might be provided with visual contact with other dogs and/or additional human interaction in an attempt to improve its welfare.

In certain cases, engineering standards are effective for specifying enforceable and unambiguous minimum requirements. These can help ensure the critical needs of a dog are met, such as minimum primary enclosure space.

One should bear in mind that the standards in the model bill and accompanying regulations are considered to be minimums; they should not be interpreted as providing guidance for ideal dog care. Responsible facilities will readily exceed most, if not all, of the stated standards.

Public health concerns

Housing multiple dogs in a facility without strict sanitation and preventive healthcare practices can promote the spread of infectious disease, including many zoonotic diseases, such as ringworm and sarcoptic mange.⁶ Insufficient attention to sanitation and healthcare, as well as housing conditions that create unnecessary stress, can pose health risks for dogs and people. Our model thereby seeks to ensure that dogs are housed and managed in ways that reduce the incidence and spread of infectious disease.

Explanation of regulations

Much of the model bill and regulations is direct and self-explanatory. The following comments are intended to help readers better understand the rationale behind selected sections.

Housing Facilities

Space—Provision of adequate space is important for the physical and psychological well-being of dogs. Here, the model combines performance standards with an engineering standard. As for performance benchmarks, a dog should have sufficient space to allow it freedom of movement and to assume normal postures, such as to lie fully recumbent.

Specifying a minimum spatial requirement provides an enforceable benchmark that corresponds with federal standards. To achieve this, the model adopts the equation used in the AWA.⁷ As a minimum criterion, it should not be used as a guide for designing ideal housing. In fact, most housing situations should visibly meet and exceed the performance standards, in which case calculation of space minimums may not be necessary.

While providing dogs with more space beyond these standards is desirable, the adoption of additional rigid space standards is not recommended. Simply providing excess cage space beyond the minimums cited does not necessarily benefit the welfare of dogs.⁸ Stricter standards would also not be practical to enforce given that many different housing situations can fulfill the welfare needs of dogs.

Flooring—Dogs should be provided with an area of solid flooring. A dog's welfare needs for comfortable housing are better met by a kennel with solid flooring.⁹ However, the use of wire flooring can assist in maintaining a clean environment. Thus, housing designs that make use of both flooring types together are acceptable.

Retreat and Security—Dogs also have a behavioral need for retreat and security. Just as a dog needs to be able to engage and explore its environment, a dog benefits from having the option to withdraw from its environment to rest.^{9,10} A den can be provided for dogs in numerous ways, from built-in platforms to simple bedding. Such guidance is provided with the understanding that exemptions may be required during behavioral training when appropriate techniques and exercises are being used to socialize dogs.

Whelping box—A pregnant dog should be provided with a whelping box prior to parturition.¹¹ The design can be variable so long as the whelping area provides a comfortable environment, security, and an appropriate temperature for the puppies is able to be maintained.

Behavioral Requirements

Dogs have an intrinsic need to exhibit certain species-typical behaviors; these behaviors allow them to maintain a healthy physical and psychological state. Well-designed housing provides a complex environment and allows the dog to choose to partake in these behaviors. For certain activities, the dog may need to be removed from its primary enclosure.

Most of the model regulations in this section are performance-based because we recognize that various housing facilities and procedures could potentially fulfill minimum requirements for dog well-being, which include:

- Daily satisfaction of specific behavioral needs.
- Not housing dogs for extended periods of time without some form of environmental enrichment.

Socialization—Dogs need both human and conspecific (dog-dog) socialization. Proper socialization is critical for the psychological development of puppies. Positive and friendly human contact should occur as often as possible. Lack of adequate socialization for puppies has been hypothesized to contribute to behavioral aggression in dogs.¹²

Adult dogs continue to need daily human and conspecific interaction. Both can be accomplished in a variety of ways, and should be integrated into husbandry whenever possible. Socialization promotes both the physical and psychological well-being of dogs,^{13,14,15} and lack of it can lead to the development of stereotypic, self-injurious, or aggressive behavioral patterns.¹⁶ These behaviors can precipitate clinical conditions, such as acral lick dermatitis and psychogenic alopecia.^{17,18} Though not definitive, abnormal behavioral patterns can be useful indicators of inadequate socialization or environmental conditions.¹⁹

Environmental Enrichment—Dogs need and benefit from a complex environment that incorporates both social and inanimate enrichment features.²⁰

Enrichment provided by inanimate objects meets important behavioral needs of dogs. For example, puppies exhibit extensive play with enrichment objects such as toys and chewing substrates.²¹ Adult dogs also use and benefit from the provision of enrichment objects.²² These objects promote species-typical behaviors such as play, chewing, and exploration. Inanimate enrichment can be easily and economically accomplished by provision of an object for play for a puppy, and an object for chewing for an adult dog. However, adequate enrichment can be accomplished in numerous ways, including furniture, platforms, and space-displacing objects.

Visual forms of enrichment can also benefit the well-being of dogs. For dogs not housed in a primary enclosure with other compatible dogs, an effort should be made to house dogs with either conspecific or human visual contact whenever possible.

Locomotor activity—Dogs should be given the opportunity for locomotory activity on a daily basis. This may involve walking on- or off-leash and/or access to an area where spontaneous activity occurs. Spontaneous activity is facilitated by adequate space, social contact and some form of enrichment. In terms of spatial needs, a dog should have the opportunity for various physical movements, such as achieving a running stride.²³ Providing additional space beyond the stated minimums is desirable, but not necessary to support suitable locomotory activity.²⁴ In fact, having interaction with other dogs, people, or an enriched environment may more effectively

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ensure healthy physical activity.²⁵ Thus, a proper locomotory regimen will provide simultaneous access to proper space and an enriched environment.

Stringent technical requirements for either a specific exercise area or time allotments for locomotory activity are not recommended as they do not provide a tangible benefit for a dog's welfare.²⁶ A dog's locomotory needs are complex and variable, and will depend on factors such as its age, breed, reproductive status, and housing environment. For example, dogs housed socially in a primary enclosure with other compatible dogs have less need for additional locomotory activity than those housed in isolation.²³ In addition, a variety of activities and situations can contribute to an acceptable locomotory program. For example, an acceptable program may include walking the dog on a leash or may include giving multiple dogs free access to a secure area. Finally, enforcement of rigid exercise area and time requirements is difficult and impractical.²⁷ For these reasons, within our model bill and regulations, only performance standards are used to ensure a dog's locomotory needs are fulfilled.

Health and Veterinary Care

All dogs must be provided with regular routine and preventive veterinary care, which must adhere to pertinent local statutes (e.g., those addressing rabies vaccination).

Health Care Protocol—Each facility should devise a standard protocol for routine veterinary care, including examination by a licensed veterinarian, a vaccination schedule, and strategies for parasite control (a list of resources providing examples of protocols for routine veterinary care is provided at the end of this document). A set of standard protocols provides caretakers with guidance about the care dogs should receive, and assists inspectors in determining whether proper routine care is being provided for each dog. For example, a properly constructed parasite control protocol will ensure that puppies aren't persistently infested with fleas. The model regulations are not specific as to individual issues to be addressed, because needs can vary widely between operations and geographic locations.

Veterinary Records—Each facility should keep a complete record of all veterinary care for each dog. These records should be available as needed for inspections, as well as at the request of a veterinarian treating a dog originating from the facility.

Daily Health and Welfare Checks—Each dog should have its general health, behavior, and overall welfare assessed daily. Any reasonable person who has experience breeding and raising dogs should be readily able to do this. Mandating daily health and welfare checks is important as it does not allow a breeder or retailer to claim ignorance in cases of neglect, nor does it allow them to withhold necessary veterinary care for obvious illness or injury. Rather, it may allow health problems to be prevented and/or identified before they reach a critical clinical stage.

Resources*

General Housing and Husbandry Standards

1. Animal Welfare Act, Dog and cat regulations, 9 CFR 3.1 – 3.19.
2. Committee on the Care and Use of Laboratory Animals, Institute of Laboratory Animal Resources, Commission of Life Sciences, National Research Council. *Guide for the Care and Use of Laboratory Animals*. Washington DC: National Academy Press, 1996.
3. Hubrecht RC. Comfortable Quarters for Dogs in Research Institutions. In: Reinhardt V, ed. *Comfortable Quarters for Laboratory Animals*. Washington DC: Animal Welfare Institute, 1997; 1 – 15.
4. Stafford K. The dog as a research animal. In: *The Welfare of Dogs*; Dordrecht, Netherlands: Springer, 2006;166-175.

Veterinary Health Care

1. AVMA Council on Biologic and Therapeutic Agents: Report on cat and dog vaccines, 2002. Available at: <http://avmajournals.avma.org/doi/pdf/10.2460/javma.2002.221.1401>. Accessed December 16, 2009
2. American Animal Hospital Association, 2006 AAHA canine vaccine guidelines, revised. 2006. Available at: <http://www.aahanet.org/PublicDocuments/VaccineGuidelines06Revised.pdf>. Accessed December 16, 2009.

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3. AVMA Guidelines on Euthanasia. Available at: http://www.avma.org/issues/animal_welfare/euthanasia.pdf. Accessed December 16, 2009.

Examples of Existing Legislation/Recommendations on Standards of Care for Dogs

1. Virginia 2009 Chapter 852 — Relating to commercial dog breeders. Available at: <http://leg1.state.va.us/cgi-bin/legp504.exe?081+ful+CHAP0852>. Accessed December 16, 2009.
2. Indiana IC 15-21 — Relating to commercial dog breeders and brokers. Available at: <http://www.in.gov/legislative/ic/code/title15/ar21/ch3.html>. Accessed December 16, 2009.
3. Indiana IC 6-9-39 — County option dog tax on kennels; applies to animal control centers, animal shelters, humane societies, other animal impounding facilities. Available at: <http://www.in.gov/legislative/ic/code/title6/ar9/ch39.html>. Accessed December 16, 2009.
4. Oregon Laws 2009 Chapter 297 — Relating to dogs (large-scale commercial breeding). Available at: <http://www.leg.state.or.us/09orlaws/sess0200.dir/0297.pdf>. Accessed December 16, 2009.
5. 2009 Wisconsin Act 90 — Relating to persons who sell dogs or operate shelters, and animal control facilities. Available at: <http://www.legis.state.wi.us/2009/data/acts/09Act90.pdf>. Accessed December 19, 2009.
6. Canadian Veterinary Medical Association. *A Code of Practice for Canadian Kennel Operations*. 2nd Ed. Ottawa, ON, Canada. 2007. Available at: <http://www.animalhealthcare.ca/pdfs/Kennel%20Code-EN.pdf>. Accessed December 16, 2009.
7. New Zealand: Ministry of Agriculture and Forestry, Code of recommendations and minimum standards for the welfare of dogs, 1998. Available at: <http://www.biosecurity.govt.nz/animal-welfare/codes/dogs/index.htm>. Accessed December 16, 2009.
8. New South Wales, Australia: Department of Primary Industries, NSW Animal Welfare Code of Practice No. 6 – Breeding Dogs. 1996. Available at: <http://www.dpi.nsw.gov.au/agriculture/livestock/animal-welfare/codes/general/aw-code-6>. Accessed December 16, 2009.
9. United Kingdom: Home Office, Code of practice for the housing of animals in designated breeding and supplying establishments, 1995. Available at: <http://scienceandresearch.homeoffice.gov.uk/animal-research/publications-and-reference/publications/code-of-practice/housing-of-animals-breeding/>

*These resources are provided as information only. With the exception of policy created or adopted by the American Veterinary Medical Association, listing of a particular resource does not imply recommendation or endorsement by the American Veterinary Medical Association.

¹ American Kennel Club. High-volume breeders: Committee report to the American Kennel Club Board of Directors. Available at: http://www.akc.org/pdfs/about/special_reports/HVBC_finalA.pdf. Accessed June 17, 2009.

² Colorado § 35-80-101 to 35-80-117

³ New York § 4:19-15.1 to 4:19-15.19

⁴ Wisconsin 2009 Act 90. Available at: <http://www.legis.state.wi.us/2009/data/acts/09Act90.pdf>. Accessed December 19, 2009.

⁵ Committee on the Care and Use of Laboratory Animals, Institute of Laboratory Animal Resources, Commission of Life Sciences, National Research Council. *Guide for the care and use of laboratory animals*. Washington DC: National Academy Press, 1996.

⁶ Newbury S, Moriello KA. Skin diseases of animals in shelters: triage strategy and treatment recommendations for common diseases. *Vet Clin North Am Small Anim Pract* 2006;36:59-88.

⁷ Animal Welfare Act. 7 USC 2131. 1985. 9 CFR 3.1 et seq.

⁸ Bebak J, Beck AM. The effect of cage size on play and aggression between dogs in purpose-bred beagles. *Lab Anim Sci* 1993;43:457-459.

⁹ Hubrecht RC. Comfortable quarters for dogs in research institutions. In: Reinhardt V, ed. *Comfortable quarters for laboratory animals*. Washington DC: Animal Welfare Institute, 1997; 1 – 15.

¹⁰ Wells, DL. A review of environmental enrichment for kennelled dogs, *Canis familiaris*. *Appl Anim Behav Sci* 2004;85:307-317.

¹¹ Johnson, CA. Pregnancy management in the bitch. *Theriogenology* 2008;70:1412-1417.

¹² Haug LI. Canine aggression toward unfamiliar people and dogs. *Vet Clin North Am Small Anim Pract* 2008;38:1023-1041.

¹³ Beerda B, Schilder MBH, Van Hoff JARAM. Chronic stress in dogs subjected to social and spatial restriction. II. Hormonal and immunological responses. *Physiol Behav* 1999;66:243-254.

¹⁴ Coppola CL, Grandin T, Enns RM. Human interaction and cortisol: Can human contact reduce stress for shelter dogs? *Physiol Behav* 2006;87:537-541.

¹⁵ Hennessy MB, Voith VL, Hawke JL. Effects of a program of human interaction and alternations in diet composition on activity of the hypothalamic-pituitary-adrenal axis in dogs housed in a public animal shelter. *J Am Vet Med Assoc* 2002;221: 65-71.

¹⁶ Beerda B, Schilder MBH, Van Hoff JARAM. Chronic stress in dogs subjected to social and spatial restriction. I. Behavioral responses. *Physiol Behav* 1999;66:233-242.

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- ¹⁷ Virga V. Behavioral dermatology. *Vet Clin North Am Small Anim Pract*, 2003 Mar, 33(2): 231-51.
- ¹⁸ Haug LI. Environmental enrichment for dogs. Unpublished handout.
- ¹⁹ Hetts S. Psychologic well-being: conceptual issues, behavioral measures, and implications for dogs. *Vet Clin North Am Small Anim Pract* 1991;21:369-387.
- ²⁰ Wells DL. A review of environmental enrichment for kenneled dogs, *Canis familiaris*. *Appl Anim Behav Sci* 2003;85: 307-317.
- ²¹ Hubrecht RC. Enrichment in puppyhood and its effects on later behavior of dogs. *Lab Anim Sci* 1995;45:70-75.
- ²² Hubrecht, RC. A comparison of social and environmental enrichment methods for laboratory housed dogs. *Appl Anim Behav Sci* 1993;37:345-361.
- ²³ Spangenberg EMF, Björklund L, Dhalborn K. Outdoor housing of laboratory dogs: effects on activity, behaviour, and physiology. *Appl Anim Behav Sci* 2006;98:260-276.
- ²⁴ Clark JD, Calpin JP, Armstrong RB. Influence of type of enclosure on exercise fitness of dogs. *Am J Vet Res* 1991;52: 1024-1028
- ²⁵ Hetts S, Clark JD, Clapin JP. Influence of housing conditions on beagle behaviour. *Appl Anim Behav Sci* 1992;34:137-155
- ²⁶ Campbell SA, Hughes HC, Griffin HE. Some effects of limited exercise on purpose-bred beagles. *Am J Vet Res* 1988: 49:1298-1301
- ²⁷ Kulpa-Eddy JA, Taylor S, Adams KM. USDA perspective on environmental enrichment for animals. *ILAR J* 2005;46:83-94

Attachment 4: Cage Stacking in Commercial Kennels

Many commercial breeding facilities house dogs in cages that are stacked one on top of the other. Many dealers stack their primary enclosures to maximize the number of breeding dogs they can contain in a facility. However, cage stacking promotes overcrowding and can prevent proper air flow, block light, make cages difficult to clean, hinder or eliminate access to exercise areas, and limit operators' ability to monitor and access the dogs.



Pauline Easley

From: Elizabeth Hartwig [REDACTED]
Sent: Saturday, June 11, 2016 1:20 AM
To: Erule Comments
Subject: Breeder Rules

Hi! I wanted to take a few moments to urge you to strengthen your guidelines for puppy mill breeding.

Animals should not be kept out door in 90 degree heat or more or less than 50 degrees.

- * The current rules barely allow dogs to comfortably move around.
- * The minimum space should be doubled and TDLR should adopt the increase size recommended by the Advisory Committee.
- * Dogs and cats should not be forced to stand or lie 24/7 on 100% wire or wire mesh for their entire lives.
- * Stacking of primary dog enclosures on top of one another jeopardizes the health and well-being of the dogs and should not be allowed.

Thank you for taking the time to reconsider the breeder rules.

Elizabeth Hartwig
949-274-5922

Pauline Easley

From: Madeleine Chapin [REDACTED]
Sent: Friday, June 10, 2016 8:35 PM
To: Erule Comments

I heard you to adopt all of the suggestions presented in the bill. If I had my way I would be hoping that you were signing into law new laws that would prohibit any type of puppy mill breeding facilities but I guess we have to take baby steps. So please take this first step. Puppy mills are a nightmare for the dogs and cats that are forced to breed over and over and live in squalor and horrible conditions. Thank you. Please do the right thing.

Pauline Easley

From: Rhonda Sapienza [REDACTED]
Sent: Friday, June 10, 2016 7:17 PM
To: Erule Comments
Subject: Non effective plan

----- Forwarded message -----

From: Mary Visser [REDACTED]
Date: Thursday, June 9, 2016
Subject: A reexamination of a non effective program
To: "erule.comments@tdlr.texas.gov" <erule.comments@tdlr.texas.gov>

After reviewing the rules and the workload of TDLR I think that common sense has been left behind. This program is not what it was made out to be to the state legislature who when passing HB 1451 stated in no uncertain terms that this program was to be paid for by the income from the fees and fines. It was stated by those pushing for this law that the state of Texas was adrift in substandard breeding enterprises and claimed that there were more than 1000 commercial substandard breeders in Texas. That has turned out to not be the case. In fact it was a gross exaggeration if not an outright lie. After 3 years TDLR has not been able to license more than 162 cat and dog breeders with 34 of this number already licensed by the USDA. This program has not been able to pay for itself since its inception and the donation fund still is not funded to take up the slack.

TDLR is not the correct location for this program as they have no animal expertise in dealing with the inspections. The training and advisory committee is overloaded with people who have an animal rights agenda and have made it clear that they are not there to do more than shut down all breeders in the state. Their goal is to end to all pet ownership as they feel all breeders are puppy mills and they have said so many times.

Per their website, TDLR says their business model focuses on efficiency in licensing and regulation. To ensure they maintain their focus, TDLR also asks themselves these following four key questions:

1. Is there sufficient critical mass of licensees to justify a licensing program? Answer is: NO! After 3 years, Texas Licensed Breeders include 75 dog breeders (with 11-25 intact females) @ annual \$300 license fee. Three (3) cat breeders and 85 dog breeders (26 or more intact females) @ annual \$500 license fee. HB 1451 is mandated by statute to be self-supported by license fees, inspection fees, and fines. Some breeders are dual licensed with USDA.

DO THE MATH! TDLR Penalties Assessed for 2014 and 2015 total: \$28,875.
Penalties Collected for these years total: \$13,725.
Four (4) Inspectors hired: \$163,200 in annual salaries, not counting lawyers, fine collection, and general costs of doing business. No way the program generates enough income to pay for itself.

Lies told at HB 1451 passage: "There would be 1,000 licensed breeders!" Then later revised in the Senate to predict "600 licensed breeders." None of this has been proven to be true as RPOA has said all along.

2. Are there regulatory alternatives to a licensing program? If another entity -- federal, state, or local -- already effectively regulates in this area, a state licensing program may not be necessary. Answer is: YES! There are federal USDA/APHIS regulations for commercial breeders ("commercial" word isn't even in HB 1451). There are state and local Animal Cruelty Laws to address all individuals and substandard breeding facilities. HB 1451 is redundant and provides an animal rights harassment "tool" for their hate campaign toward ALL animal breeders.

3. Can the licensing program fit the functional business model at TDLR, which relies on electronic applications and renewals, online payments, and integration into our licensing software? Answer is: NO! Live animals can NOT fit this business model and require "hands on" by persons with animal expertise. TDLR has no other animal programs and no animal expertise.

4. Does the program fit with the TDLR competencies? Answer is: NO! TDLR says that they must rely on the biased Breeder Advisory Committee (BAC) for advice. The BAC is dominated by "animal rights" activists, who lobbied heavily for the bill's passage in 2011. Oklahoma transferred their Breeder License Program to the OK Agriculture Department and abolished the Breeder Advisory Committee for these same reasons.

It is clear from watching the advisory committee at work that the bias against breeders is evident and that the state of Texas was never a haven for substandard breeders as the THLN stated in its push to get HB1451 enacted. This program is costing the state millions of dollars while our children are being denied funding for schools and education. This program is not paying for itself and its clear it is redundant with the federal government doing the work already. The only legal answer to these questions is to repeal HB 1451 or move the program to the Department of Agriculture where it rightfully belongs. As it is presently run now it has become a tool of one small group of people who have stated from the out set that owning, loving or caring for any pet is an abomination that must be abolished. It is so much sentimental claptrap that the only solution is the elimination of this symbiotic millions of years old relationship between all domestic animals and human beings. As their leaders say so often we will not stop until there are no more dogs or cats born. This is the crux of this problem a fanatical belief being supported and paid for by our own tax dollars. To protect the domestic animals of Texas and our rights this program must be moved to an agency that is there to help and support such endeavors at the highest levels of care that will promote the best aspects of pet ownership and animal husbandry not eliminate it altogether as Animal rights beliefs would do. Repeal HB 1451 or move it. Protect domestic animals from those who would end our rights to our pets best care.

Rhonda Sapienza

Sent from my iPhone

Pauline Easley

From: Leigh-Anna Provenzano [REDACTED]
Sent: Friday, June 10, 2016 7:00 PM
To: Erule Comments
Subject: Puppy mills.

Please consider strengthening laws regarding puppy mills. Regarding the climate here in Texas which can be quite extreme, dogs should not be made to live outdoors when the temperature soars above 90 or drops below 50°. Animals can dehydrate, can get burned by the sun, can die in the heat. Cold-weather presents other problems to these warm blooded mammals. Stacking crates presents unsanitary conditions. Current space is insufficient and barely a lousy animal to turn around and it's crate. Having an animal on wiremesh standing or lying down 24 hours a day seven days a week is cruel and painful. These are basic standards. Please think very deeply and thoroughly when making your decisions. You are the voice for the voiceless. Thank you for taking the time to read my email.
God bless, Leigh-Anna

Pauline Easley

From: [REDACTED]
Sent: Friday, June 10, 2016 6:13 PM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

In particular, I respectfully urge the Department to propose rules to afford breeding dogs more cage space, require a solid resting surface and ban the unsafe and unsanitary practice of stacking dogs' cages on top of one another. Breeding dogs typically spend their entire lives in these cages so these modest improvements are critical to ensuring a basic standard of wellbeing and safety for them.

Stop this cruelty!!

Thank you for your consideration.

Sincerely,

Ofelia Ramirez

Pauline Easley

From: [REDACTED]
Sent: Friday, June 10, 2016 5:15 PM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

In particular, I respectfully urge the Department to propose rules to afford breeding dogs more cage space, require a solid resting surface and ban the unsafe and unsanitary practice of stacking dogs' cages on top of one another. Breeding dogs typically spend their entire lives in these cages so these modest improvements are critical to ensuring a basic standard of wellbeing and safety for them.

Thank you for your consideration.

Sincerely,

nancy shelly

Pauline Easley

From: Erica Riffel [REDACTED]
Sent: Friday, June 10, 2016 4:28 PM
To: Erule Comments
Subject: Licensed Breeder Rule Review

Dear TDLR,

I urge you to strengthen the current standards of the Licensed Breeder Rule to ensure basic protections for thousands of dogs and cats confined and raised in Texas breeding facilities for most of their life.

I wholeheartedly support stronger legislature to ensure the overall health, safety and well-being of these animals.

Erica C. Riffel
Fort Worth TX

Pauline Easley

From: [REDACTED]
Sent: Friday, June 10, 2016 3:47 PM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

In particular, I respectfully urge the Department to propose rules to afford breeding dogs more cage space, require a solid resting surface and ban the unsafe and unsanitary practice of stacking dogs' cages on top of one another. Breeding dogs typically spend their entire lives in these cages so these modest improvements are critical to ensuring a basic standard of wellbeing and safety for them.

Thank you for your consideration.

Sincerely,

Rachel Combs

Pauline Easley

From: Martha [REDACTED]
Sent: Friday, June 10, 2016 3:44 PM
To: Erule Comments
Subject: Rules

Please ban all puppy mills.

If not possible please protect from heat, with adequate space and vet requirements.

I feel strongly these are barbaric operations making money off the suffering of animals. We can and should do better.

Sincerely,

Martha White
Austin, Texas

Sent from my iPhone

Pauline Easley

From: Webb & Lauterbach, PC [REDACTED]
Sent: Friday, June 10, 2016 3:35 PM
To: Erule Comments
Subject: Standards - licensed breeder facilities in Texas

Dear Sir,

As part of the review by the Texas Department of Licensing and Regulation ("TDLR") regarding licensed breeder facilities in Texas, I would like to request that the TDLR clarify and improve certain of the regulations, by adopting the following standards:

1. Animals should not be housed outdoors when temperatures exceed 90 degrees or fall below 50 degrees,
2. The size of animal housing, per animal, should be increased from the current requirement
3. Wire or wire mesh should be prohibited from the flooring of any housing
4. Stacking of housing crates should be prohibited

These standards will allow the TDLR to better achieve the legislative mandate of housing conditions that facilitate the health, safety and well-being of each animal

Thank you very much,
Barbara Lauterbach
Houston, Texas

Pauline Easley

From: Mollie Cook [REDACTED]
Sent: Friday, June 10, 2016 2:51 PM
To: Erule Comments
Subject: Puppy Mills Standards

The puppy mill standards need to be strengthened. As of now, they are legal businesses promoting animal abuse and cruelty. If I had my way, they would all be shut down because they are cruel and also contribute to the overpopulation of dogs and also increase euthanasia of thousands of dogs on a yearly basis. It is also shameful how many of these puppy mill dogs go to flea markets in the United States to be sold to an unknown future after their usefulness is done. These dogs are treated worse than livestock by so many individuals.

Please do the following to improve their conditions:

Animals should be prohibited from being kept in an outdoor facility when the temperature reaches more than 90 degrees or less than 50 degrees.

Current rules provide an insufficient space for a dog's comfort and barely allows enough room for the animal to turn around. The minimum space should be doubled and TDLR should adopt the increased size recommended by the Advisory Committee when the initial Rules were considered.

Dogs and cats should not be forced to stand or lie 24/7 on 100% wire or wire mesh for their entire lives. Among other problems, this can result in severe damage to their limbs, paws and is highly unsanitary.

Stacking of primary dog enclosures on top of one another jeopardizes the health and well-being of the dogs and should not be allowed.

If this can't be done, please shut them down. Animal abuse is against the law but like I said, this is legal abuse and it shouldn't be tolerated. Our companion animals deserve better than this.

Thank you,
Mollie Cook

Pauline Easley

From: [REDACTED]
Sent: Friday, June 10, 2016 2:16 PM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

In particular, I respectfully urge the Department to propose rules to afford breeding dogs more cage space, require a solid resting surface and ban the unsafe and unsanitary practice of stacking dogs' cages on top of one another. Breeding dogs typically spend their entire lives in these cages so these modest improvements are critical to ensuring a basic standard of wellbeing and safety for them.

I pray that this will merit your kind consideration to help these loving animals have a better life and living situation. Thank very much and God bless.

Thank you for your consideration.

Sincerely,

Perllie Sulit

Pauline Easley

From: [REDACTED]
Sent: Friday, June 10, 2016 1:49 PM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

In particular, I respectfully urge the Department to propose rules to afford breeding dogs more cage space, require a solid resting surface and ban the unsafe and unsanitary practice of stacking dogs' cages on top of one another. Breeding dogs typically spend their entire lives in these cages so these modest improvements are critical to ensuring a basic standard of wellbeing and safety for them.

Moreover, I propose the rules include a section on animals being protected from inclement weather. Many facilities do not take into consideration the aspect of keeping their animals comfortable in freezing or scorching weather. Many female dogs are confined with their puppies, in suffocating hot or freezing cold out buildings where ventilation is minimal to none. The breeding dogs must endure cold or heat their entire lives in squalid living conditions.

These animals are suffering. It is up to society to change their plight by requiring they get the basic compassionate care. We can also make it harder for greedy, uncaring, individuals to profit from animal abuse and neglect.

Thank you for your consideration.

Sincerely,

Doris Davis

Pauline Easley

From: [REDACTED]
Sent: Friday, June 10, 2016 1:35 PM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

In particular, I respectfully urge the Department to propose rules to afford breeding dogs more cage space, require a solid resting surface and ban the unsafe and unsanitary practice of stacking dogs' cages on top of one another. Breeding dogs typically spend their entire lives in these cages so these modest improvements are critical to ensuring a basic standard of wellbeing and safety for them.

Thank you for your consideration.

Sincerely,

Evelyn Parker

Pauline Easley

From: Second Giygas [REDACTED]
Sent: Friday, June 10, 2016 1:44 PM
To: Erule Comments
Subject: I stand with dogs

Hello, I am a producer from Texas. My name is Phillip and I agree with these guidelines to protect animals from harm.

- Animals should be prohibited from being kept in an outdoor facility when the temperature reaches more than 90 degrees or less than 50 degrees.
- Current rules provide an insufficient space for a dog's comfort and barely allows enough room for the animal to turn around. The minimum space should be doubled and TDLR should adopt the increased size recommended by the Advisory Committee when the initial Rules were considered.
- Dogs and cats should not be forced to stand or lie 24/7 on 100% wire or wire mesh for their entire lives. Among other problems, this can result in severe damage to their limbs, paws and is highly unsanitary.
- Stacking of primary dog enclosures on top of one another jeopardizes the health and well-being of the dogs and should not be allowed.

Pauline Easley

From: Cheryl Gardner [REDACTED]
Sent: Friday, June 10, 2016 1:35 PM
To: Erule Comments
Subject: Puppy Mill Regulations

If we can't eliminate puppy mills (my choice), we should at least make certain the following regulations are in force, and that appropriate criminal penalties are in force for people and organizations that do not follow them:

Cheryl Gardner, Bedford, TX

- Animals should be prohibited from being kept in an outdoor facility when the temperature reaches more than 90 degrees or less than 50 degrees.
- Current rules provide an insufficient space for a dog's comfort and barely allows enough room for the animal to turn around. The minimum space should be doubled and TDLR should adopt the increased size recommended by the Advisory Committee when the initial Rules were considered.
- Dogs and cats should not be forced to stand or lie 24/7 on 100% wire or wire mesh for their entire lives. Among other problems, this can result in severe damage to their limbs, paws and is highly unsanitary.
- Stacking of primary dog enclosures on top of one another jeopardizes the health and well-being of the dogs and should not be allowed.

Pauline Easley

From: Jessica Odom [REDACTED]
Sent: Friday, June 10, 2016 1:26 PM
To: Erule Comments
Subject: Puppy mill legislation

To whom it may concern re. "breeding facilities" in Texas:

Please strengthen the following standards, which don't go far enough to meet their mandate of ensuring these animals well-being:

- Animals should be prohibited from being kept in an outdoor facility when the temperature reaches more than 90 degrees or less than 50 degrees.
- Current rules provide an insufficient space for a dog's comfort and barely allows enough room for the animal to turn around. The minimum space should be doubled and TDLR should adopt the increased size recommended by the Advisory Committee when the initial Rules were considered.
- Dogs and cats should not be forced to stand or lie 24/7 on 100% wire or wire mesh for their entire lives. Among other problems, this can result in severe damage to their limbs, paws and is highly unsanitary.
- Stacking of primary dog enclosures on top of one another jeopardizes the health and well-being of the dogs and should not be allowed.

Sincerely,

Jessica Odom
Lifetime Texas resident

Pauline Easley

From: [REDACTED]
Sent: Friday, June 10, 2016 12:36 PM
To: Erule Comments
Subject: Puppy mills are a horror and a disgrace.

Puppy mills are a horror and a disgrace. Our shelters and rescues are flooded with the results of this cruel industry.

Sent from my iPad

Pauline Easley

From: Terrie MacLaren [REDACTED]
Sent: Friday, June 10, 2016 12:20 PM
To: Erule Comments
Subject: Licensed Breeder Rules Comments

I am writing to comment on the upcoming review of the Texas Licensed Breeder Rules. I work with animal rescue and see so many animals who have been abandoned for so many reasons including health issues. It is concerning that licensed breeders are not held to higher standards when caring for animals in their charge. Better treatment of these animals would not only result in healthier animals, but it is also the ethically and morally right thing to do.

I admit that I hope for the day that puppies will not be mass produced in Texas, but I realize we are not at that point yet. Please make the standards of care for these animals more humane now. Specifically, temperature standards for heat and cold, increased space for confined animals, prohibition of wire bottomed cages, and prohibition of the stacking of cages.

Texans have such pride in choosing to do what is right. Raising the bar in caring for these dogs is unarguably the right thing to do.

Respectfully,
Terrie MacLaren
Sent from my iPad

Pauline Easley

From: [REDACTED]
Sent: Saturday, June 11, 2016 2:48 PM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

In particular, I respectfully urge the Department to propose rules to afford breeding dogs more cage space, require a solid resting surface and ban the unsafe and unsanitary practice of stacking dogs' cages on top of one another. Breeding dogs typically spend their entire lives in these cages so these modest improvements are critical to ensuring a basic standard of wellbeing and safety for them.

Thank you for your consideration.

Sincerely,

Christina Wood

Pauline Easley

From: [REDACTED]
Sent: Saturday, June 11, 2016 2:44 PM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

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Thank you for your consideration.

Sincerely,

Lisa Diaz

Pauline Easley

From: [REDACTED]
Sent: Saturday, June 11, 2016 2:22 PM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

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Thank you for your consideration.

Sincerely,

Melody Downs

Pauline Easley

From: [REDACTED]
Sent: Saturday, June 11, 2016 2:18 PM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

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Thank you for your consideration.

Sincerely,

Jennifer Jung

Pauline Easley

From: [REDACTED]
Sent: Saturday, June 11, 2016 2:18 PM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

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Thank you for your consideration.

Sincerely,

Patricia Finos

Pauline Easley

From: [REDACTED]
Sent: Saturday, June 11, 2016 2:09 PM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

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Thank you for your consideration.

Sincerely,

Janeth Lopez

Pauline Easley

From: [REDACTED]
Sent: Saturday, June 11, 2016 1:56 PM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

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Thank you for your consideration.

Sincerely,

Jennifer Pearson-McClean

Pauline Easley

From: [REDACTED]
Sent: Saturday, June 11, 2016 1:54 PM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

In particular, I respectfully urge the Department to propose rules to afford breeding dogs more cage space, require a solid resting surface and ban the unsafe and unsanitary practice of stacking dogs' cages on top of one another. Breeding dogs typically spend their entire lives in these cages so these modest improvements are critical to ensuring a basic standard of wellbeing and safety for them.

Thank you for your consideration.

Sincerely,

Jackie Edgarperson

Pauline Easley

From: [REDACTED]
Sent: Saturday, June 11, 2016 1:38 PM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

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Thank you for your consideration.

Sincerely,

Brittany Lynch

Pauline Easley

From: [REDACTED]
Sent: Saturday, June 11, 2016 1:35 PM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

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Please stop all commercial dog breeding in Texas. I don't care how they say improvements will be made by the above paragraphs, conditions for commercial breeding will not improve.

Thank you for your consideration.

Sincerely,

John Judah

Pauline Easley

From: [REDACTED]
Sent: Saturday, June 11, 2016 1:28 PM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

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Please stop all puppy mills. To many unwanted animals. And please please if you still allow pet stores make them sell shelter dogs only. This will help all animals. Have a happy home instead of a cruel death. Thank you

Thank you for your consideration.

Sincerely,

Robin Decker

Pauline Easley

From: [REDACTED]
Sent: Saturday, June 11, 2016 1:17 PM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

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Thank you for your consideration.

Sincerely,

John Hurles

Pauline Easley

From: [REDACTED]
Sent: Saturday, June 11, 2016 1:09 PM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

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All animals deserve a respectable life. This includes breeding dogs. There should be a complete ban on breeding dogs for a minimum of 5 years or until we can stop euthanizing thousands of dogs each year. It's a deplorable, archaic practice that needs to be outlawed. We need stronger laws protecting their rights and stronger laws against abusers of animals. It's a matter of time before these laws are passed in favor of animals. I am hoping it will be Texas that takes responsibility and leads the way.

Thank you for your consideration.

Sincerely,

Sherie Ingram

Pauline Easley

From: [REDACTED]
Sent: Saturday, June 11, 2016 1:04 PM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

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Thank you for your consideration.

Sincerely,

Diane Zimmerman

Pauline Easley

From: [REDACTED]
Sent: Saturday, June 11, 2016 1:02 PM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

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Thank you for your consideration.

Sincerely,

Bridgette McDonald

Pauline Easley

From: [REDACTED]
Sent: Saturday, June 11, 2016 12:34 PM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

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Thank you for your consideration.

Sincerely,

Barbara Wasserman

Pauline Easley

From: [REDACTED]
Sent: Saturday, June 11, 2016 12:30 PM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

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Thank you for your consideration.

Sincerely,

Pam Rucker

Pauline Easley

From: [REDACTED]
Sent: Saturday, June 11, 2016 12:27 PM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

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Thank you for your consideration.

Sincerely,

Jessica Motta

Pauline Easley

From: [REDACTED]
Sent: Saturday, June 11, 2016 12:14 PM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

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Thank you for your consideration.

Sincerely,

Glkria Lazaga

Pauline Easley

From: [REDACTED]
Sent: Saturday, June 11, 2016 12:06 PM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

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Thank you for your consideration.

Sincerely,

Kathi Gillin

Pauline Easley

From: [REDACTED]
Sent: Saturday, June 11, 2016 12:06 PM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

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Thank you for your consideration.

Sincerely,

Maren Brantner

Pauline Easley

From: [REDACTED]
Sent: Saturday, June 11, 2016 12:03 PM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

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Thank you for your consideration.

Sincerely,

Linda Booth

Pauline Easley

From: [REDACTED]
Sent: Saturday, June 11, 2016 12:02 PM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

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Thank you for your consideration.

Sincerely,

Christine Ouder

Pauline Easley

From: [REDACTED]
Sent: Saturday, June 11, 2016 11:53 AM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

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Thank you for your consideration.

Sincerely,

Jwanh Kallna

Pauline Easley

From: [REDACTED]
Sent: Saturday, June 11, 2016 11:52 AM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

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Thank you for your consideration.

Sincerely,

Ivana Nikolic

Pauline Easley

From: [REDACTED]
Sent: Saturday, June 11, 2016 11:52 AM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

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it is barbaric and cruel
greed rules all

Thank you for your consideration.

Sincerely,

Valerie Sisson

Pauline Easley

From: [REDACTED]
Sent: Saturday, June 11, 2016 11:46 AM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

In particular, I respectfully urge the Department to propose rules to afford breeding dogs more cage space, require a solid resting surface and ban the unsafe and unsanitary practice of stacking dogs' cages on top of one another. Breeding dogs typically spend their entire lives in these cages so these modest improvements are critical to ensuring a basic standard of wellbeing and safety for them.

For the love of God-Stop these Puppy Mills!

Thank you for your consideration.

Sincerely,

Pamela Shuel-Sargent

Pauline Easley

From: Deborah [REDACTED]
Sent: Saturday, June 11, 2016 11:46 AM
To: Erule Comments
Subject: Puppy Mills in Texas

Re: Review of the Licensed Breeders Rules

Many breeders are so cruel! They need to make sure that the wire cages are not just stacked on top of each other with feces and urine falling from the top cage to the bottom cage. They need to make sure the animals don't live in the elements 24/7. When it is cold, they need to be indoors. They need adequate housing! They can't just live in a wire enclosure. They have to have room to move. It is cruel treatment to make an animal live in a cage 24/7. They need to stretch their limbs just like we do.

Please work to regulate these breeders and make sure the animals get proper care.

Deborah Brown
Deborah Brown Communications
214-649-1773

[REDACTED]

Pauline Easley

From: [REDACTED]
Sent: Saturday, June 11, 2016 11:45 AM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

In particular, I respectfully urge the Department to propose rules to afford breeding dogs more cage space, require a solid resting surface and ban the unsafe and unsanitary practice of stacking dogs' cages on top of one another. Breeding dogs typically spend their entire lives in these cages so these modest improvements are critical to ensuring a basic standard of wellbeing and safety for them.

Stop breeding !

Thank you for your consideration.

Sincerely,

Jacqueline Branham

Pauline Easley

From: [REDACTED]
Sent: Saturday, June 11, 2016 11:44 AM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

In particular, I respectfully urge the Department to propose rules to afford breeding dogs more cage space, require a solid resting surface and ban the unsafe and unsanitary practice of stacking dogs' cages on top of one another. Breeding dogs typically spend their entire lives in these cages so these modest improvements are critical to ensuring a basic standard of wellbeing and safety for them.

Thank you for your consideration.

Sincerely,

Ami Richardsen

Pauline Easley

From: RESPONSIBLE PET OWNERS ALLIANCE [REDACTED]
Sent: Friday, June 10, 2016 11:39 AM
To: Erule Comments
Subject: Comments for Review of Texas Licensed Dog & Cat Breeders Program
Attachments: Letter - TDLR 6_8_2016 HB 1451.pdf; TDLR - Comments Repeal HB 1451.pdf; HSUS et al Letter to TDLR re Breeders 12_2012.pdf

Dear Sirs:

General Counsel Charles Johnson e-mailed me that you will open attachments.

Therefore our comments are attached regarding the Review of Texas Licensed Dog & Cat Breeders Program for re-adoption, revision, or repeal. We appreciate TDLR's reconsideration of this failed program.

Attached are our cover letter, Comments and one other attachment.

Please confirm receipt of this email and attachments.

God bless,

Mary Beth Duerler

Cell: (210) 213-2809

Executive Director and President

Responsible Pet Owners Alliance

900 NE Loop 410 #311-D

San Antonio, TX 78209

... the reasonable voice regarding animal issues

June 9, 2016

Texas Department of Licensing & Regulation
ATTENTION: CHARLES JOHNSON
PO Box 12157
Austin, TX 78711



Dear Sirs:

Please accept Responsible Pet Owners Alliance’s response to your request for comments regarding review of the Texas Licensed Dog and Cat Breeders Program for re-adoption, revision, or repeal to determine whether reasons for these rules still exist.

- **HB 1451 must be REPEALED in its entirety OR TRANSFERRED to Texas Department of Agriculture.** This is TDLR’s only animal program. TDLR admits they have no animal expertise and depend on the Breeder Advisory Committee for guidance. in 2012, Oklahoma transferred their Pet Breeder Program (passed previous year) to be under the Oklahoma Agriculture Department and abolished their Breeder Advisory Committee for the same reasons we face in Texas.
- **Abolish the Breeder Advisory Committee, which will always be dominated by “animal rights” extremists who want to regulate pet breeding out of existence.**

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Dr. Lori Teller, DVM, said it best: “I am resigning my position on the [Texas Department of Licensing & Regulation] Breeder Advisory Committee [representing veterinarians] ... I have become disillusioned with the process. Unfortunately I do not feel we are going down the right road to improve animal welfare ... I think we are driving the good breeders out of business ... the breeders who do seriously care about the animals they raise and improving the breeds they are passionate about will either be out of business or, at the least, out of state.”

God bless,

Mary Beth Duerler

Mary Beth Duerler
Executive Director and President
Attachment: TDLR Letter from HSUS, ASPCA, THLN



November 28, 2012

Christina Kaiser, Director of Enforcement
Texas Department of Licensing & Regulation
P.O. Box 12157, Capital Station
Austin, TX 78711

Re: Licensing of Texas Breeders

Dear Ms. Kaiser:

In 2011, the Texas legislature passed the Dog and Cat Breeders Act (the “Act”), which requires any breeder who possesses eleven or more breeding female dogs and sells or offers to sell at least 20 dogs in a calendar year to be licensed by the Texas Department of Licensing and Regulation (the “Department”). It has come to our attention that assertions are being made indicating that there are not enough breeders in the state of Texas to financially support administration of the new law. The Texas Humane Legislation Network (THLN), the American Society for the Prevention of Cruelty to Animals (ASPCA), and The Humane Society of the United States (HSUS) worked in coalition to support passage of the Act in 2011, and we urge the Department to perform a thorough search for all breeders who may fall under the new licensing requirement in order to ensure adequate funding for enforcement of the Act, but more importantly, to ensure that dogs and cats living in the state’s many commercial breeding kennels are protected. We fully support the Department’s efforts in enforcing the law, which went into effect on September 1st, and we believe there are many Texas-based breeders who fall within the definition of “Dog or Cat Breeder” as set forth in the Act.

To that end, we have performed a very cursory search to identify breeders within the State of Texas who may fall under the requirements of the Act. We are providing this information to the Department as a starting point. All of the contents were found by performing a basic internet search, and even if only half of these puppies are from large commercial breeders, that still indicates that there are hundreds of breeders in the state who may require a license. We encourage the Department to dedicate adequate resources to continuing this effort on an ongoing basis. Many commercial breeders advertise the puppies they sell on puppy classified websites like www.nextdaypets.com, www.puppyfind.com, www.dogbreederdirectory.com, and the like. In order to sell their “product,” breeders must make their information available to the public. As such, it is readily available.

We would be happy to provide the Department with the methodology we used in performing our search and with any other information that may make enforcement of the Act less burdensome for the

Department. We appreciate the efforts the Department has made to date to ensure adequate protections for dogs and cats.

Should you have any questions or need additional information, please contact: Cile Holloway with THLN [Tel: (214) 537-3531; ██████████]; Deborah Foote with ASPCA [Tel: (720) 219-0782; ██████████]; or Katie Jarl with HSUS [Tel: (713) 516-7892; ██████████]. Thank you for your time and consideration.

Respectfully submitted,



Cile Holloway
President
Texas Humane Legislation Network



Deborah Foote
Southwest Legislative Director
American Society for the Prevention of Cruelty to Animals



Katie Jarl
Texas Senior State Director
The Humane Society of the United States

NEW TEXAS DOG AND CAT BREEDER LAW (HB 1451) IS A NATIONAL “ANIMAL RIGHTS” LEGISLATIVE AGENDA AND SHOULD BE REPEALED OR TRANSFERRED TO BE UNDER TEXAS DEPARTMENT OF AGRICULTURE!

Report to Congress on Domestic and International Terrorism On Animal Enterprises by Department of Justice (September 2, 1993): “All extremist animal rights groups are believed to be associated with each other by leadership, membership, or both. Many advocates of animal rights oppose all ways in which animals are confined and utilized by humans, whether it be for food, clothing, servitude, or household pets.”



Texas Department of Licensing & Regulation (TDLR) is now reviewing the Licensed Dog & Cat Breeders Program for re-adoption, revision, or repeal. TDLR will determine whether reasons for these rules still exist. June 13, 2016, is the deadline for comments.

- ❖ Is it obsolete? Does it reflect current legal and policy consideration? Is it in alignment with TDLR’s current procedures?

American Kennel Club and United Kennel Club exhibitors are caught in this radical “animal rights” net because **TDLR General Counsel Charles Johnson** ruled that show/hobby breeders are not exempt under HB 1451’s “Performance Dog” Exemption. No exemptions have been granted to date for any exemption categories for dog breeders.

The **“Commercial” word** was removed in the first House Committee Hearing. HB 1451 was always intended to regulate ALL Texas dog and cat breeders and “eliminate” them! HB 1451 has 10 pages and TDLR has written almost 30 pages of additional “HB 1451 Rules.”

Enforcement of the misnamed “Puppy Mill” Bill (HB 1451) began September 1, 2012 and is a disaster less than 4 years later. The program is required by statute to cover all administration and enforcement costs with license fees, inspection fees, and fines.

- **HB 1451 must be REPEALED in its entirety OR TRANSFERRED to Texas Department of Agriculture.** This is TDLR’s only animal program. TDLR admits they have no animal expertise and depend on the biased Breeder Advisory Committee for guidance. Oklahoma transferred their Pet Breeder Program to be under Oklahoma Agriculture Department and abolished their Breeder Advisory Committee for the same reasons we have in Texas.
- **Abolish the Breeder Advisory Committee, which will always be dominated by “animal rights” extremists.**

Dr. Lori Teller, DVM, says it best: “I am resigning my position on the [Texas Department of Licensing & Regulation] Breeder Advisory Committee [representing veterinarians] ... I have become disillusioned with the process. Unfortunately I do not feel we are going down the right road to improve animal welfare ... I think we are driving the good breeders out of business ... the breeders who do seriously care about the animals they raise and improving the breeds they are passionate about will either be out of business or, at the least, out of state.”

The Dog and Cat Breeder Law will never be “self-supporting” due to the small number of licensed dog and cat breeders in Texas. Bill proponents lied repeatedly to get this bill passed in 2011.

The House Committee Fiscal Report predicted 1,000 licensed dog and cat breeders at estimated annual cost of more than \$1 million. The Senate Committee Fiscal Report predicted 600 licensed breeders at \$565,242 cost. TDLR reports differ, but approximately 150-160 licensed dog and cat breeders exist today, including only 3 cat breeders, who are likely USDA dual licensed.

USDA recently passed new APHIS Rules regarding Pet Breeders ((Dogs, Cats, Hamsters, etc.)

Attorney Phil Guidry, American Kennel Club’s Government Relations Department, stated [regarding HB 1451]: “Proponents in 2011 made certain economic self-funding arguments that ... as of today, certainly have not been met. Since the Texas Breeder Law enactment in 2011, USDA has vastly expanded its regulatory class, therefore making the Texas licensing and regulation regime even more marginal and redundant.”

The new USDA Rule requires federal USDA licensing for breeders of more than four “breeding” (undefined) females of most species of pets (except birds) and selling even one animal “sight unseen.” All sales must be “face to face” to remain exempt. Internet sales are also affected.

Oklahoma: In 2012 Rep. Phil Richardson, a veterinarian and chairman of OK House Agriculture Committee, authored a bill to “Repeal and Replace” their existing state Commercial Pet Breeders Law (passed previous year). Richardson’s bill passed; transferred the administration of the program to the Oklahoma Agriculture Department and eliminated the “Oklahoma Board of Commercial Pet Breeders.” Rep. Richardson said the Pet Breeders’ Board had become too confrontational with pet breeders and that the Oklahoma Agriculture Department was better able to deal with the situation.

Under TX HB 1451: “Dog and Cat Breeder” is defined as being in “possession” of more than 10 Intact Female Dogs & Cats (combined) over 6 months old, AND “offering” to sell or trade more than 20 offspring annually. Holding certain exhibition and working dog pups 2 years for exhibition, health tests and evaluation puts show breeders over the intact female limit easily and requires licensing with USDA regulations that cannot be met in their homes. Breeders must prove they are “not breeding” certain intact female dogs and cats.

Humane Society of the US, Texas Humane Legislation Network, and ASPCA mailed a letter to TDLR shortly after HB 1451 passage, listing 400 dog/cat breeder websites “violating” the new Licensed Breeder Law. (See Attachment #1.) TDLR is mandated to investigate every “anonymous” complaint, giving Texas “animal rights” extremists a tool for breeder harassment, especially those breeders not required to be licensed.

TDLR mails deceptive letters to dog and cat breeders, but neglects to include the real “Breeder Definition” above. In their desperation to license more breeders, TDLR only tells breeders that HB 1451 states: “A person may not act as, offer to act as, or represent that the person is a dog or cat breeder in this state unless the person holds a license under this chapter for each facility that the person owns or operates in this state.” We opposed this section, but it remains in HB 1451 – undoubtedly to deliberately confuse the issue.

FINANCIAL STATISTICS FOR ADMINISTRATION OF HB 1451

HB 1451 is mandated by statute to be self-supported by license fees, inspection fees, and fines.

(Some real “commercial” breeders are dual licensed with USDA and Texas.)

Minor discrepancies have been found between TDLR Open Records Requests, TDLR Breeder Advisory Committee Reports, and TDLR’s website, but do not alter the overall picture significantly.

TOTAL Year 2016: 145 LICENSED DOG AND CAT BREEDERS

There is no way the program generates enough income to pay for itself.

Per Open Record Request 5/29/2016: Licensed Dog & Cat Breeders include:

75 dog breeders (with 11-25 intact females) @ annual \$300 license fee = \$22,500 Income.

Three (3) cat breeders and 85 dog breeders (26 or more intact females) @ annual \$500 license fee = \$44,000 Income. Total License Fees Income = \$66,500.

Other Income:

Penalties Assessed for 2014 and 2015 total: \$28,875.

Penalties Collected (Less than half!) for these years total: \$13,725.

“Some Other Program Expenses:”

Enforcement Cases: 30 administrative orders issued since 2013. 29 orders involved unlicensed activity (respondent acting as, offering to act as, or representing they were a dog or cat breeder when they did not hold a license).

Four (4) Inspectors hired: \$40,800 (each) Annual Salary = \$163,200.

TDLR added a license and Permit specialist who earns between 34,500 and 37,115 annually and a Legal Assistant II - General Counsel: \$46,700 - \$49,000.

HOUSE: FISCAL NOTE FOR “PREDICTED” 1,000 LICENSED DOG AND CAT BREEDERS

Texas Legislative Budget Board, April 14, 2011

All Funds, Five-Year Impact:

Fiscal Year	Probable Savings/(Cost) from General Revenue Fund 1	Probable Revenue Gain/(Loss) from General Revenue Fund 1	Change in Number of State Employees from FY 2011
2012	(\$1,342,755)	\$1,342,755	14.5
2013	(\$1,258,403)	\$1,258,403	14.5
2014	(\$1,258,403)	\$1,258,403	14.5
2015	(\$1,258,403)	\$1,258,403	14.5
2016	(\$1,258,403)	\$1,258,403	14.5

SENATE: FISCAL NOTE FOR “PREDICTED” 600 LICENSED DOG AND CAT BREEDERS

Texas Legislative Budget Board, May 18, 2011

All Funds, Five-Year Impact:

Fiscal Year	Probable Savings/(Cost) from General Revenue Fund 1	Probable Revenue Gain/(Loss) from General Revenue Fund 1	Change in Number of State Employees from FY 2011
2012	(\$565,242)	\$565,242	6.0
2013	(\$565,242)	\$565,242	6.0
2014	(\$565,242)	\$565,242	6.0
2015	(\$565,242)	\$565,242	6.0
2016	(\$565,242)	\$565,242	6.0

What's Wrong with HB 1451?

There's not a single humane society, animal shelter, veterinary hospital nor local animal control facility in Texas that can meet the regulations in HB 1451, mandated to be no less than federal USDA Regulations for the Animal Welfare Act, originally written for sterile animal research animal facilities.

HB 1451 mandates all this and much more:

- **Breeder Exemptions for "Performance Events" do not apply to American Kennel Club and United Kennel Club competitions:** Conformation Shows, Agility, Obedience Trials.
- **Allows TDLR to write any "rules" it desires to administer HB 1451.**
- **Impossible to enforce** without demanding warrantless entry to private property to "count" the number of intact female dogs and cats (over 6 months of age).
- **Real "commercial" dog/cat breeders are dual licensed by state of Texas and USDA.**
- **Proof is upon the breeder that intact females are *not* being bred (no existing criteria.)**
- **Allows "anonymous" complaints which mandate costly "investigations."**
- **\$1,000 "Breeder Bounty,"** which leads to breeder harassment from "animal rights" extremists. Humane Society of U.S. offers a \$5,000 "Breeder Bounty" nationwide.

- **USDA regulations (required at a minimum) were written for large sterile animal research facilities.** \$20,000 to \$30,000 required to build USDA compliant facility, if even allowed as a commercial "business" due to zoning, property size, etc.
- **Requires all surfaces to be impervious to moisture,** special disposal and drainage systems, ventilation, bio-hazard control, exercise, evenly diffused natural or artificial diurnal lighting on regular diurnal cycles, and temperature controls (which can't vary more than 2 hours) and not be lower than 45 degrees and not above 85 degrees. Washrooms. No animals allowed in house unless all wall and ceiling surfaces "sanitized."
- **USDA Standards for handling, care, housing, treatment and transportation of dogs and cats by a breeder are impossible to meet in a home setting.** (Perhaps this was the intent.)

- **"Criminal Background Check"** required for breeders and all employees.
- **Allows "Third Party Inspectors,"** who could be biased "animal rights" extremists.
- **Establishes a "Snitch Slush Fund,"** the Dog/Cat Breeder Training and Enforcement Fund which may solicit and accept gifts, grants, and donations from any source; paying for information resulting in disciplinary action against breeders.
- **Establishes a biased Breeders Advisory Committee.**

- **Cat physiology not same as that of a dog.** Dog breeds differ in many significant ways regarding care and confinement. All dog breeds are not created equally regarding sizes, thickness of coat, activity levels, and appropriate ambient temperature levels.
- **Mandates breeding facilities (homes?) to be open "business hours."** Inspections do not require any breeder notification.
- **Exemptions are worthless as written.** Self executing. TDLR says "must prove it when they come to get you." Do inspectors write rules as they go along? How do breeders know?
- **Federal "engineering" standards are required as opposed to "performance" standards.** An **engineering standard** requires adherence to very specific requirements declared by a government agency to be the only way acceptable. A **performance standard** directs regulated parties to reach a result but does not lay down specific requirements, allowing license holders to reach the desired result using their own discretion and in a variety of ways.

What's Wrong With The Breeders Advisory Committee?

**With the current "Political Animal Climate" in the U.S.,
it would be impossible to appoint an impartial committee
with extensive expertise in the care of any animals!**

Dr. Lori Teller, DVM, says it best: "I am resigning my position on the [Texas Department of Licensing & Regulation] Breeder Advisory Committee [representing veterinarians] ... I have become disillusioned with the process. Unfortunately I do not feel we are going down the right road to improve animal welfare ... I think we are driving the good breeders out of business ... the breeders who do seriously care about the animals they raise and improving the breeds they are passionate about will either be out of business or, at the least, out of state."

TDLR Assistant General Counsel Della Wood Lindquist, an "animal rights" extremist, helped draft HB 1451 and later the oppressive over-the-top "TDLR Rules" --- a serious conflict of interest.

Natalie Lynch, an Austin attorney, was recently appointed to represent Texas Humane Legislation Network (THLN) as an animal "welfare" organization on the Breeder Advisory Committee! THLN is an animal "rights" organization; not "welfare" and has no programs – only "legislative agendas" -- as their name implies. THLN is the Humane Society of the U.S. "affiliate" for Texas. Our RPOA application as a true "animal welfare" organization (with effective programs in our state) was rejected.

TDLR's exploitation by "animal rights" extremist personnel was first reported in The Texas Tribune (4/6/2011) by Brandi Grissom: Grissom describes TDLR Assistant General Counsel Della Wood Lindquist as a "Volunteer with Emancipet, an Austin animal 'rights' group." Further reporting that Lindquist's Facebook page was populated with posts from animal "rights" groups and that Lindquist worked with Rep. Senfronia Thompson to write the bill. Grissom said Lindquist even made a visit to one Austin show dog kennel, and asked Dale Martensen for a tour of his facility to "conduct research." Martensen has subsequently moved his breeding program to Oklahoma. The list of groups Lindquist "likes" on Facebook was a virtual directory of animal "rights" groups, including The Humane Society of the United States and the Texas Humane Legislation Network, both key backers of the misnamed "Puppy Mill Bill."

HB 1451 was written to ensure that TDLR would oversee regulations, knowing that TDLR Assistant General Counsel Della Wood Lindquist (Volunteer with Emancipet, an Austin animal "rights" group) would be there to keep the rules so strict that breeders would be forced out of business. Grissom further reported that Susan Stanford, TDLR spokesman, said "leaders are aware of Lindquist's involvement in animal 'rights' causes. Though she is working on the puppy mill legislation and would be involved in implementation," Stanford said, "Lindquist would not have carte blanche to write these rules. She's working as a team member."

To prove our point: **James Bias, president of SPCA of Texas**, told Claire Cardona with Dallas Morning News (9/31/2012) **"I hope it [HB 1451] will be a catalyst for getting out of the business and saying, 'This isn't worth it.'"**

Skip Trimble, Texas Humane Legislation Network, told Cardona the {USDA} regulations are "totally inadequate." Their motto: Regulate until there are none!

These fanatics will never be satisfied until they end all interaction with animals – their goal.

What better way than to end all breeding, sales, and "ownership" of pets? They prefer pet "guardians" to the term pet "owners."

Pauline Easley

From: [REDACTED]
Sent: Friday, June 10, 2016 11:37 AM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

In particular, I respectfully urge the Department to propose rules to afford breeding dogs more cage space, require a solid resting surface and ban the unsafe and unsanitary practice of stacking dogs' cages on top of one another. Breeding dogs typically spend their entire lives in these cages so these modest improvements are critical to ensuring a basic standard of wellbeing and safety for them.

For the health and welfare of both the animals being bred and the humans buying their offspring breeders should not only be required to provide larger cages but these animals shouldn't be caged. For sanitation and health reasons animals require ample space to move around. These animals should have comfortable and safe sleeping areas and receive exercise. Texas should place stronger restrictions on commercial breeders because not only are they currently allowed to get away with treating animals inhumanely but they create an emotional and financial burden for Texans who purchase the offspring that come from these breeders. Texas legislature should protect animal welfare and consumer rights.

Thank you for your consideration.

Sincerely,

Rainlilly Elizondo

Pauline Easley

From: [REDACTED]
Sent: Friday, June 10, 2016 11:12 AM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

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Thank you for your consideration.

Sincerely,

Marney Reed

Pauline Easley

From: Olman Carvajal [REDACTED]
Sent: Friday, June 10, 2016 10:45 AM
To: Erule Comments
Subject: Standards for Animals in Licensed Breeding Facilities

Dear TDLR,

I am writing to urge you to please strengthen the following standards for dogs and cats who are raised and live in licensed breeding facilities in Texas.

Cats and dogs are not products that can be simply warehoused without proper regard for their welfare. These are very basic standards to ensure the overall health, safety and well being of these animals.

Strengthening these standards would greatly improve the physical health, living space, and psychological well being of thousands of animals.

Animals should be prohibited from being kept in an outdoor facility when the temperature reaches more than 90 degrees or less than 50 degrees.

Current rules provide an insufficient space for a dog's comfort and barely allows enough room for the animal to turn around. The minimum space should be doubled and TDLR should adopt the increased size recommended by the Advisory Committee when the initial Rules were considered.

Dogs and cats should not be forced to stand or lie 24/7 on 100% wire or wire mesh for their entire lives. Among other problems, this can result in severe damage to their limbs, paws and is highly unsanitary.

Stacking of primary dog enclosures on top of one another jeopardizes the health and well-being of the dogs and should not be allowed.

Thank you for your time and attention to this urgent matter.

Sincerely,

Olman Carvajal
League City, TX

Pauline Easley

From: [REDACTED]
Sent: Friday, June 10, 2016 10:07 AM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

In particular, I respectfully urge the Department to propose rules to afford breeding dogs more cage space, require a solid resting surface and ban the unsafe and unsanitary practice of stacking dogs' cages on top of one another. Breeding dogs typically spend their entire lives in these cages so these modest improvements are critical to ensuring a basic standard of wellbeing and safety for them.

Thank you for your consideration.

Sincerely,

Karen Kotara

Pauline Easley

From: [REDACTED]
Sent: Friday, June 10, 2016 9:45 AM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

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Thank you for your consideration.

Sincerely,

Jessica Black

Pauline Easley

From: [REDACTED]
Sent: Friday, June 10, 2016 9:16 AM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

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Thank you for your consideration.

Sincerely,

Delta Brown

Pauline Easley

From: [REDACTED]
Sent: Friday, June 10, 2016 8:54 AM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

In particular, I respectfully urge the Department to propose rules to afford breeding dogs more cage space, require a solid resting surface and ban the unsafe and unsanitary practice of stacking dogs' cages on top of one another. Breeding dogs typically spend their entire lives in these cages so these modest improvements are critical to ensuring a basic standard of wellbeing and safety for them.

I am very grateful for this opportunity to speak on behalf of my furry friends. I respectfully urge the Department to share the same civilized and humane living conditions in which humans live. We are responsible for providing humane conditions for all living creatures. We are a very advanced society with many luxuries, and I ask that we act in accordance with the highest level of sophistication in which we are capable. These little guys deserve respect, and we can respect ourselves more for extending this courtesy.

Thank you for your consideration.

Sincerely,

Charity Hicks

Pauline Easley

From: Robin Smith [REDACTED]
Sent: Friday, June 10, 2016 1:34 AM
To: Erule Comments
Subject: Texas Puppy Mills

Please help make it possible to continue to eliminate puppy mills which are cruel and inhumane.

Thank you!
R. Smith – adamant dog lover!

Pauline Easley

From: [REDACTED]
Sent: Friday, June 10, 2016 12:36 AM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

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Canines and cats have been with us every step of the way. None of us would be what we are today without the others. It is time to stop these lazy ungrateful criminal breeders

Thank you for your consideration.

Sincerely,

Jane Ferson

Pauline Easley

From: [REDACTED]
Sent: Thursday, June 09, 2016 11:05 PM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

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Thank you for your consideration.

Sincerely,

Carrie Watson

Pauline Easley

From: [REDACTED]
Sent: Thursday, June 09, 2016 10:33 PM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

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Thank you for your consideration.

Sincerely,

Charlotte Howard

Pauline Easley

From: [REDACTED]
Sent: Thursday, June 09, 2016 10:21 PM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

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I have seen the horrible conditions that these poor dogs and cats have lived in.

Breeders that only think of the bottom line that treat these animals with no respect, nor care if they die. Females dogs breed to the point that their uterus falls out, they have no teeth from multiple litters. Conditions so horrible that I wondered how anything could have survived it. My dog was taken from one of these mills. He was so sick, the vet did not think he would live another 48 hours. He had broken teeth from being kicked, fractured ribs, Infections in eyes, ears, skin lesions, rectal bleeding from poor food and this is the beginning. He is doing very well now. Another one of my puppy mill dogs died at 5 years because he was so in breed, his immune system shut down. Again make the laws tough. Only you can insure the quality of life for these animals that become of future pets. We love these little guys and when we get a dog from a bad breeder the owner and the animal suffers. We lose the very thing that gave us happiness and joy. The animal that suffered the horrible conditions of cages and no contact or touch a life time of nothing but one litter after another until they die.

Make the laws tough and enforce these laws. We all will benefit.

Thank you for your consideration.

Sincerely,

Brenda Goldman

Pauline Easley

From: [REDACTED]
Sent: Thursday, June 09, 2016 7:35 PM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

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Thank you for your consideration.

Sincerely,

Pat Brooks

Pauline Easley

From: [REDACTED]
Sent: Thursday, June 09, 2016 6:43 PM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

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Thank you for your consideration.

Sincerely,

Lynn Buehler

Pauline Easley

From: [REDACTED]
Sent: Thursday, June 09, 2016 6:35 PM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

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Put yourselves in their place, how would you like living in cages stacked on top of one another? They have feelings just like we do & we are their voice. The breeders are only out to make money at their expense. If you who serve on the Texas DLR do not comprehend how these animals are suffering or do not care about these beautiful & lovable animals, then maybe you should consider stepping down & let someone who really understands & cares to fill the positions.

Thank you for your consideration.

Sincerely,

Beatrice Castillo

Pauline Easley

From: [REDACTED]
Sent: Thursday, June 09, 2016 6:05 PM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

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Thank you for your consideration.

Sincerely,

Ari Meyer

Pauline Easley

From: [REDACTED]
Sent: Thursday, June 09, 2016 5:29 PM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

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Thank you for your consideration.

Sincerely,

Terry Chupik

Pauline Easley

From: [REDACTED]
Sent: Thursday, June 09, 2016 5:17 PM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

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Benefiting the health of these trapped animals is very important. Their life is not good, and anything to lessen their suffering should be done.

Thank you for your consideration.

Sincerely,

Terry Chupik

Pauline Easley

From: [REDACTED]
Sent: Thursday, June 09, 2016 4:28 PM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

In particular, I respectfully urge the Department to propose rules to afford breeding dogs more cage space, require a solid resting surface and ban the unsafe and unsanitary practice of stacking dogs' cages on top of one another. Breeding dogs typically spend their entire lives in these cages so these modest improvements are critical to ensuring a basic standard of wellbeing and safety for them.

If people are going to breed dogs for profit, they should AT LEAST house them in comfortable, sanitary conditions since many of the dogs spend their entire lives in the same cage.

Thank you for your consideration.

Sincerely,

Susan Veatch

Pauline Easley

From: [REDACTED]
Sent: Thursday, June 09, 2016 4:21 PM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

In particular, I respectfully urge the Department to propose rules to afford breeding dogs more cage space, require a solid resting surface and ban the unsafe and unsanitary practice of stacking dogs' cages on top of one another. Breeding dogs typically spend their entire lives in these cages so these modest improvements are critical to ensuring a basic standard of wellbeing and safety for them.

Please help these poor victims of greedy and unscrupulous breeders by proposing and passing laws that will help them have better quality of life.

Thank you for your consideration.

Sincerely,

Anna Leal

Pauline Easley

From: [REDACTED]
Sent: Thursday, June 09, 2016 4:18 PM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

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These dogs are treated horribly--crammed in cages, females forced to get pregnant over and over again, not enough food and water, no human touch or love. These dogs deserve to be healthy, happy and loved!

Thank you for your consideration.

Sincerely,

Mary A Leon

Pauline Easley

From: [REDACTED]
Sent: Thursday, June 09, 2016 3:47 PM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

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Thank you for your consideration.

Sincerely,

Virginia Marengo

Pauline Easley

From: [REDACTED]
Sent: Thursday, June 09, 2016 3:40 PM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

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Thank you for your consideration.

Sincerely,

Salina Vitela

Pauline Easley

From: Leena Carvajal [REDACTED]
Sent: Thursday, June 09, 2016 2:25 PM
To: Erule Comments
Subject: Standards for Animals in Licensed Breeding Facilities

Dear TDLR,

I am writing to urge you to please strengthen the following standards for dogs and cats who are raised and live in licensed breeding facilities in Texas.

Cats and dogs are not products that can be simply warehoused without proper regard for their welfare. These are very basic standards to ensure the overall health, safety and well being of these animals.

Strengthening these standards would greatly improve the physical health, living space, and psychological well being of thousands of animals.

- Animals should be prohibited from being kept in an outdoor facility when the temperature reaches more than 90 degrees or less than 50 degrees.
- Current rules provide an insufficient space for a dog's comfort and barely allows enough room for the animal to turn around. The minimum space should be doubled and TDLR should adopt the increased size recommended by the Advisory Committee when the initial Rules were considered.
- Dogs and cats should not be forced to stand or lie 24/7 on 100% wire or wire mesh for their entire lives. Among other problems, this can result in severe damage to their limbs, paws and is highly unsanitary.
- Stacking of primary dog enclosures on top of one another jeopardizes the health and well-being of the dogs and should not be allowed.

Thank you for your time.
Sincerely,
Leena Carvajal
League City, TX

Pauline Easley

From: [REDACTED]
Sent: Thursday, June 09, 2016 2:05 PM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

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I volunteer at one of the largest kill shelters and it is beyond sad all the beautiful dogs and cats that never get a chance to be adopted.

Thank you for your consideration.

Sincerely,

Tina Lewis

Pauline Easley

From: [REDACTED]
Sent: Thursday, June 09, 2016 1:55 PM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

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Please STOP this inhumane practice of "puppy mills". It is said you judge the true character of a nation by "THE WAY IT TREATS ITS ANIMALS(!)".

Please do what you can for our dogs!

Thank you,

Ray Stout
713-562-8064

Thank you for your consideration.

Sincerely,

Ray Stout

Pauline Easley

From: [REDACTED]
Sent: Thursday, June 09, 2016 1:21 PM
To: Erule Comments
Subject: Puppy mills should against the law period. Please help stop this vicious cycle of death, greed for heartless mills.

Sent from my MetroPCS 4G LTE Android device

Pauline Easley

From: [REDACTED]
Sent: Thursday, June 09, 2016 1:03 PM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

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Thank you for your consideration.

Sincerely,

Goldyn Summitt

Pauline Easley

From: [REDACTED]
Sent: Thursday, June 09, 2016 11:27 AM
To: Erule Comments
Subject: LICENSED BREEDERS RULES

I am a native Texan and there are many things I love about our great State. What I do not enjoy is our inability to be courageous and face down those dog breeders whose only goal is profit at the expense of defenseless animals. Many breeders are oblivious and callous toward animal suffering and abuse.

The Licensed Breeders Rules are weak. Surely our Texas legislators have the strength and bravery to counteract the ranting of the breeders, whose main goal is money with no work.

Here are the improvements in standards we (as caring Texans) must make:

1. All breeders should provide larger cages with solid flooring instead of metal wiring, where paws can easily become caught and bloodied. In a kennel with stacked cages of wire flooring, dogs may injure or mutilate limbs of other dogs housed above or below them, and of course urine and feces can fall on the animals in the cages below.
2. During extreme weather conditions (heat at 90 degrees and above, cold at 50 degrees and below, rain and thunderstorms), breeders may not keep dogs in an outdoor facility and must take measures to keep dogs safe and protected from the elements.
3. Double the size of the crates. These dogs are forced to live their entire lives in cages where the current rules state that this life is okay in a cage with 6 inches to spare on either side. Humane? Not a chance.

A wise man once said:

"The greatness of a nation can be judged by the way its animals are treated".

In the same vein, the reputation of Texas is deteriorating by its refusal to take a stand for the humane treatment of animals.

Thank you for the opportunity to provide these comments.

Carol Haskins

Dallas, TX

Sent from my iPad

Pauline Easley

From: [REDACTED]
Sent: Thursday, June 09, 2016 9:41 AM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

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Thank you for your consideration.

Sincerely,

Jenny Shepherd

Pauline Easley

From: Jill Youngblood [REDACTED]
Sent: Thursday, June 09, 2016 9:08 AM
To: Erule Comments
Subject: Please strengthen existing legislation that will help protect animals living in breeding facilities

I support efforts of the Texas Humane Legislative Network, and of my state representative, Kenneth Sheets, to mandate that ALL animals living with breeders are treated in the most humane manner possible. Many still are not. It is heartbreaking to know that there are still abuses going on.

I support these measures:

- Animals should be prohibited from being kept in an outdoor facility when the temperature reaches more than 90 degrees or less than 50 degrees.
- Current rules provide an insufficient space for a dog's comfort and barely allows enough room for the animal to turn around. The minimum space should be doubled and TDLR should adopt the increased size recommended by the Advisory Committee when the initial Rules were considered.
- Dogs and cats should not be forced to stand or lie 24/7 on 100% wire or wire mesh for their entire lives. Among other problems, this can result in severe damage to their limbs, paws and is highly unsanitary.
- Stacking of primary dog enclosures on top of one another jeopardizes the health and well-being of the dogs and should not be allowed.

Please take the appropriate action necessary to ensure that no animal, who is already forced to breed, will have to endure reprehensible conditions throughout his life.

Many thanks,

Jill Youngblood
8000 Rhoads Rd
Aubrey, Texas 76227
760-310-7005

Pauline Easley

From: [REDACTED]
Sent: Thursday, June 09, 2016 8:50 AM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

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Please treat God's creatures with the love and respect they deserve. We have been given the trust from our creator TO take care of His creatures great and small.
Please Please help!

Thank you for your consideration.

Sincerely,

Elizabeth Farish

Pauline Easley

From: [REDACTED]
Sent: Thursday, June 09, 2016 8:36 AM
To: Erule Comments
Subject: LICENSED BREEDERS RULES

I am a native Texan and there are many things I love about our great State. What I do not enjoy is our inability to be courageous and face down those dog breeders whose only goal is profit at the expense of defenseless animals. Many breeders are oblivious and callous toward animal suffering and abuse.

The Licensed Breeders Rules are weak. Surely our Texas legislators have the strength and bravery to counteract the ranting of the breeders, whose main goal is money with no work.

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3. Double the size of the crates. These dogs are forced to live their entire lives in cages where the current rules state that this life is okay in a cage with 6 inches to spare on either side. Humane? Not a chance.

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In the same vein, the reputation of Texas is deteriorating by its refusal to take a stand for the humane treatment of animals.

Thank you for the opportunity to provide these comments.

Carol Haskins

Dallas, TX

Sent from my iPad

Pauline Easley

From: [REDACTED]
Sent: Thursday, June 09, 2016 8:12 AM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

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Thank you for your consideration.

Sincerely,

Jessica Denny

Pauline Easley

From: [REDACTED]
Sent: Thursday, June 09, 2016 7:46 AM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

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Thank you for your consideration.

Sincerely,

Lindsay McDermott

Pauline Easley

From: [REDACTED]
Sent: Thursday, June 09, 2016 7:30 AM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

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"A society can be judged, by the way they treat their animals"

Thank you for your consideration.

Sincerely,

Jane Berman

Pauline Easley

From: Mary Visser [REDACTED]
Sent: Thursday, June 09, 2016 7:25 AM
To: Erule Comments
Subject: A reexamination of a non effective program

After reviewing the rules and the workload of TDLR I think that common sense has been left behind. This program is not what is was made out to be to the state legislature who when passing HB 1451 stated in no uncertain terms that this program was to be paid for by the income from the fees and fines. It was stated by those pushing for this law that the state of Texas was adrift in substandard breeding enterprises and claimed that there were more than 1000 commercial substandard breeders in Texas. That has turned out to not be the case. In fact it was a gross exaggeration if not an out right lie. After 3 years TDLR has not been able to license more than 162 cat and dog breeders with 34 of this number already licensed by the USDA. This program has not been able to pay for itself since its inception and the donation fund still is not funded to take up the slack.

TDLR is not the correct location for this program as they have no animal expertise in dealing with the inspections. The training and advisory committee is overloaded with people who have an animal rights agenda and have made it clear that they are not there to do more than shut down all breeders in the state. Their goal is to end to all pet ownership as they feel all breeders are puppy mills and they have said so many times.

Per their website, TDLR says their business model focuses on efficiency in licensing and regulation. To ensure they maintain their focus, TDLR also asks themselves these following four key questions:

1. Is there sufficient critical mass of licensees to justify a licensing program? Answer is: NO! After 3 years, Texas Licensed Breeders include 75 dog breeders (with 11-25 intact females) @ annual \$300 license fee. Three (3) cat breeders and 85 dog breeders (26 or more intact females) @ annual \$500 license fee. HB 1451 is mandated by statute to be self-supported by license fees, inspection fees, and fines. Some breeders are dual licensed with USDA.

DO THE MATH! TDLR Penalties Assessed for 2014 and 2015 total: \$28,875. Penalties Collected for these years total: \$13,725. Four (4) Inspectors hired: \$163,200 in annual salaries, not counting lawyers, fine collection, and general costs of doing business. No way the program generates enough income to pay for itself. Lies told at HB 1451 passage: "There would be 1,000 licensed breeders!" Then later revised in the Senate to predict "600 licensed breeders." None of this has been proven to be true as RPOA has said all along.

2. Are there regulatory alternatives to a licensing program? If another entity -- federal, state, or local -- already effectively regulates in this area, a state licensing program may not be necessary. Answer is: YES! There are federal USDA/APHIS regulations for commercial breeders ("commercial" word isn't even in HB 1451). There are state and local Animal Cruelty Laws to address all individuals and substandard breeding facilities. HB 1451 is redundant and provides an animal rights harassment "tool" for their hate campaign toward ALL animal breeders.

3. Can the licensing program fit the functional business model at TDLR, which relies on electronic applications and renewals, online payments, and integration into our licensing software? Answer is: NO! Live animals can NOT fit this business model and require "hands on" by persons with animal expertise. TDLR has no other animal programs and no animal expertise.

4. Does the program fit with the TDLR competencies? Answer is: NO! TDLR says that they must rely on the biased Breeder Advisory Committee (BAC) for advice. The BAC is dominated by "animal rights" activists, who lobbied heavily for the bill's passage in 2011. Oklahoma transferred their Breeder

License Program to the OK Agriculture Department and abolished the Breeder Advisory Committee for these same reasons.

It is clear from watching the advisory committee at work that the bias against breeders is evident and that the state of Texas was never a haven for substandard breeders as the THLN stated in its push to get HB1451 enacted. This program is costing the state millions of dollars while our children are being denied funding for schools and education. This program is not paying for itself and its clear it is redundant with the federal government doing the work already. The only legal answer to these questions is to repeal HB 1451 or move the program to the Department of Agriculture where it rightfully belongs. As it is presently run now it has become a tool of one small group of people who have stated from the out set that owning, loving or caring for any pet is an abomination that must be abolished. It is so much sentimental claptrap that the only solution is the elimination of this symbiotic millions of years old relationship between all domestic animals and human beings. As their leaders say so often we will not stop until there are no more dogs or cats born. This is the crux of this problem a fanatical belief being supported and paid for by our own tax dollars. To protect the domestic animals of Texas and our rights this program must be moved to an agency that is there to help and support such endeavors at the highest levels of care that will promote the best aspects of pet ownership and animal husbandry not eliminate it altogether as Animal rights beliefs would do. Repeal HB 1451 or move it. Protect domestic animals from those who would end our rights to our pets best care.

Professor M. Visser

Pauline Easley

From: [REDACTED]
Sent: Thursday, June 09, 2016 5:23 AM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

In particular, I respectfully urge the Department to propose rules to afford breeding dogs more cage space, require a solid resting surface and ban the unsafe and unsanitary practice of stacking dogs' cages on top of one another. Breeding dogs typically spend their entire lives in these cages so these modest improvements are critical to ensuring a basic standard of wellbeing and safety for them.

These animals deserve better treatment than being in cages for long periods of time. They need their own space of indoor rooms and outdoor spaces to be to move around each day. The stacking of cages must stop immediately and the long time of any animal in a cage must stop. If the breeders cannot afford the proper facilities (not by law, but by humanity), then they do not need to be breeding animals. These dogs and cats should be treated with the same decency of a child. Would they do this to their children?

Thank you for your consideration.

Sincerely,

James Mainz

Pauline Easley

From: [REDACTED]
Sent: Thursday, June 09, 2016 4:49 AM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

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Thank you for your consideration.

Sincerely,

Ingrid Oliva

Pauline Easley

From: [REDACTED]
Sent: Thursday, June 09, 2016 2:25 AM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

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Thank you for your consideration.

Sincerely,

Leslie Richardson

Pauline Easley

From: [REDACTED]
Sent: Thursday, June 09, 2016 12:21 AM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

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Thank you for your consideration.

Sincerely,

Belinda Starkey

Pauline Easley

From: [REDACTED]
Sent: Wednesday, June 08, 2016 11:55 PM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

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Thank you for your consideration.

Sincerely,

Catherine Wilson

Pauline Easley

From: [REDACTED]
Sent: Wednesday, June 08, 2016 11:35 PM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

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every one should have to go by the law when it comes to any animals in Texas. they have to have the right cage water food and the right care. I so tried with all this we will give you months and some times years to make thing better. NO NO they need to get it down right now or close them down or take the animals away. stop this long turn time to change thing. why do they have to suffer? if it was a child would you do that.. NO well a animal the same as a child!!!!!!!!!!!!!! get harder laws and make it a must that the pets have to be fixed so we don't have more animals suffering. shame on you all for not taking harder laws. shame on you... fix it and take action.

Thank you for your consideration.

Sincerely,

yvonne vicars

Pauline Easley

From: [REDACTED]
Sent: Wednesday, June 08, 2016 11:01 PM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

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Simple, humane, ethical solutions.

Thank you for your consideration.

Sincerely,

Cecelia Noll

Pauline Easley

From: [REDACTED]
Sent: Wednesday, June 08, 2016 10:57 PM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

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Thank you for your consideration.

Sincerely,

Patricia Bourland

Pauline Easley

From: [REDACTED]
Sent: Wednesday, June 08, 2016 10:42 PM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

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Thank you for your consideration.

Sincerely,

Brenda McFadden

Pauline Easley

From: [REDACTED]
Sent: Wednesday, June 08, 2016 10:39 PM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

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Convicts are treated better than dogs in puppy mills, and they are in prison as a direct result of their behavior. Dogs have done nothing to deserve such horrible abuse, and the people who inflict that abuse must be regulated and held accountable for their actions. I urge you to do everything in your power to ensure a better quality of life for these defenseless creatures.

Thank you for your consideration.

Sincerely,

Joyce Powell

Pauline Easley

From: [REDACTED]
Sent: Wednesday, June 08, 2016 9:16 PM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

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Animals are defenseless creatures at the mercy of those who care for them. It is our responsibility to care for them and treat them with compassion.

Thank you for your consideration.

Sincerely,

Sandi Vargas

Pauline Easley

From: [REDACTED]
Sent: Wednesday, June 08, 2016 9:15 PM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

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Thank you for your consideration.

Sincerely,

Vida Mahmoudi

Pauline Easley

From: [REDACTED]
Sent: Wednesday, June 08, 2016 8:27 PM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

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Thank you for your consideration.

Sincerely,

Ray Walker

Pauline Easley

From: resa rose [REDACTED]
Sent: Wednesday, June 08, 2016 8:22 PM
To: Erule Comments
Subject: Re: Review Licensed Breeder Rules

The current standards of what is considered "humane" according to the Licensed Breeder Rules must be addressed and changed. The current requirements for a Breeder to pass inspection concerning acceptable housing in all areas of the process does not ensure the animals are existing in humane living conditions. The requirements should have never been allowed to be "watered down" to start with.

I urge TDLR to put truly humane mandates in place during the review process.

Respectfully

Resa Rose
249 Bluebonnet Dr
Burleson TX.

[Sent from Yahoo Mail on Android](#)

Pauline Easley

From: [REDACTED]
Sent: Wednesday, June 08, 2016 8:22 PM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

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In addition, I truly believe that all puppy mills should be shut down for the sake of these poor animals that are neglected and even abused. There are plenty of dogs in shelters all over the world who would love a chance at a forever home. Let's give these pups a chance.

Thank you for your consideration.

Sincerely,

debra espinosa

Pauline Easley

From: [REDACTED]
Sent: Wednesday, June 08, 2016 8:16 PM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

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Thank you for your consideration.

Sincerely,

Anne Bradstreet

Pauline Easley

From: [REDACTED]
Sent: Wednesday, June 08, 2016 8:04 PM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

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Thank you for your help in working to improve the quality of these dogs!

Thank you for your consideration.

Sincerely,

Kimbra Moer

Pauline Easley

From: Jeanne Daniels [REDACTED]
Sent: Wednesday, June 08, 2016 7:57 PM
To: Erule Comments
Subject: Licensed Breeders Rules

The scourge of puppy mills in Texas must be addressed! To meet TDLR's mandate of ensuring the well being of the untold, beleaguered animals trapped in puppy mills in our state, I urgently request you to immediately strengthen the following "standards" that do not even begin to cover the tragic situation.

- Animals should be prohibited from being kept in an outdoor facility when the temperature reaches more than 90 degrees or less than 50 degrees.
- Current rules provide an insufficient space for a dog's comfort and barely allows enough room for the animal to turn around. The minimum space should be doubled and TDLR should adopt the increased size recommended by the Advisory Committee when the initial Rules were considered.
- Dogs and cats should not be forced to stand or lie 24/7 on 100% wire or wire mesh for their entire lives. Among other problems, this can result in severe damage to their limbs, paws and is highly unsanitary.
- Stacking of primary dog enclosures on top of one another jeopardizes the health and well-being of the dogs and should not be allowed.

The relentless suffering endured by these poor animals should make this TDLR's top priority!

Sincerely,

Jeanne Crusemann Daniels

Pauline Easley

From: Kathy Wan [REDACTED]
Sent: Wednesday, June 08, 2016 7:56 PM
To: Erule Comments
Subject: Please strengthen existing legislation that will help protect animals living in breeding facilities

I support efforts of the Texas Humane Legislative Network, and state representative, Kenneth Sheets, to mandate that ALL animals living with breeders are treated in the most humane manner possible. The majority of livestock animals are treated better than domestic animals. Let's make sure all animals receive humane treatment.

I support these measures:

- Animals should be prohibited from being kept in an outdoor facility when the temperature reaches more than 90 degrees or less than 50 degrees.
- Current rules provide an insufficient space for a dog's comfort and barely allows enough room for the animal to turn around. The minimum space should be doubled and TDLR should adopt the increased size recommended by the Advisory Committee when the initial Rules were considered.
- Dogs and cats should not be forced to stand or lie 24/7 on 100% wire or wire mesh for their entire lives. Among other problems, this can result in severe damage to their limbs, paws and is highly unsanitary.
- Stacking of primary dog enclosures on top of one another jeopardizes the health and well-being of the dogs and should not be allowed.

Please take the appropriate action necessary to ensure that no animal, who is already forced to breed, will have to endure reprehensible conditions throughout his life.

Many thanks,

Kathy Wan
2315 Highlands Creek Rd
Carrollton TX 75007

Pauline Easley

From: [REDACTED]
Sent: Wednesday, June 08, 2016 6:51 PM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

In particular, I respectfully urge the Department to propose rules to afford breeding dogs more cage space, require a solid resting surface and ban the unsafe and unsanitary practice of stacking dogs' cages on top of one another. Breeding dogs typically spend their entire lives in these cages so these modest improvements are critical to ensuring a basic standard of wellbeing and safety for them.

Please strengthen the regulations to protect these innocent animals and punish the monsters who run puppy mills.

Thank you for your consideration.

Sincerely,

Terry Banda

Pauline Easley

From: [REDACTED]
Sent: Wednesday, June 08, 2016 6:46 PM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

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Thank you for your consideration.

Sincerely,

Cristine Wheatley

Pauline Easley

From: [REDACTED]
Sent: Wednesday, June 08, 2016 6:32 PM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

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Thank you for your consideration.

Sincerely,

Patti Gouker

Pauline Easley

From: [REDACTED]
Sent: Wednesday, June 08, 2016 6:18 PM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

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Thank you for your consideration.

Sincerely,

Bren Cozad

Pauline Easley

From: [REDACTED]
Sent: Wednesday, June 08, 2016 5:53 PM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

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Thank you for your consideration.

Sincerely,

Tracey Davis

Pauline Easley

From: [REDACTED]
Sent: Wednesday, June 08, 2016 5:42 PM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

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These are Gods beautiful creatures. They have a heart beat, they breathe, They feel sadness, fear, pain and loneliness. They feel happiness and joy. They love and give so much love. We were given these beautiful beings to love and nurture and care for and they deserve a beautiful healthy life filled with love, kindness and compassion. Please save these gifts of life

Thank you for your consideration.

Sincerely,

Leeann Williams

Pauline Easley

From: [REDACTED]
Sent: Wednesday, June 08, 2016 5:36 PM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

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Please put an end to puppy mills. If someone wants a dog let them go to the shelter and adopt. So many of these beautiful animals are put down every day. Thanks and God bless

Thank you for your consideration.

Sincerely,

Ann Tyree

Pauline Easley

From: Patti Koning [REDACTED]
Sent: Wednesday, June 08, 2016 5:35 PM
To: Erule Comments
Subject: Necessary improvements to Licensed Breeder Rules

Dear Members of the Texas Department of Licensing and Regulation,

I understand that you are currently accepting public comments regarding the regulations pertaining to Licensed Breeding Facilities in Texas. I am writing to urge you to strengthen the regulations of these facilities in the following crucial ways:

1. The current rules do not provide sufficient room within the animals' enclosures for them to move sufficiently or lie down. This is clearly inconsistent with maintaining even a minimal level of health and wellbeing for these confined creatures, and the regulations should be amended to double the current space required for each animal, as previously recommended to the Department when the current rules were adopted.
2. The enclosures should not have primarily wire or mesh flooring, as these materials cause damage to the animals' limbs, paws and skin and promote the spread of bacteria and disease. Further, these enclosures must not be permitted to be stacked upon one another, as even with more appropriate flooring the stacking creates unsanitary conditions and jeopardizes the safety of the animals as a result of instability and other associated problems.
3. The regulations must be amended to prohibit the animals being subjected to extreme temperature conditions, as an urgent matter of their health and safety. Specifically, animals must be brought indoors when outside temperatures, or the temperatures in their enclosures, reaches 90 degrees Fahrenheit, or drops below 50 degrees Fahrenheit.

Thank you very much for taking these comments into consideration and for fulfilling your duty to require and enforce humane and sustainable conditions for animals in licensed breeding facilities in Texas. Many Texas citizens, including the undersigned, consider this an extremely important issue and we hope your sense of compassion will guide you as you amend the regulations.

Yours truly,

Patricia Koning
Dallas, Texas

Pauline Easley

From: Lisa Cassell [REDACTED]
Sent: Wednesday, June 08, 2016 5:23 PM
To: Erule Comments
Subject: Standards in animal breeding facilities

Dear Sir or Madam,

I hated even writing those words above because I despise people who purposefully breed more animals when so many pets are already destroyed each and every day in this country, as great tax payor expense, because there are too many homeless dogs and cats. However, I am writing today to ask you to strengthen the following standards in these facilities.

- 1) Animals should be prohibited from being kept in an outdoor facility when the temperature reaches more than 90 degrees or less than 50 degrees.
-
- 2) Current rules provide an insufficient space for a dog's comfort and barely allows enough room for the animal to turn around. The minimum space should be doubled and TDLR should adopt the increased size recommended by the Advisory Committee when the initial Rules were considered.
-
- 3) Dogs and cats should not be forced to stand or lie 24/7 on 100% wire or wire mesh for their entire lives. Among other problems, this can result in severe damage to their limbs, paws and is highly unsanitary.
-
- 4) Stacking of primary dog enclosures on top of one another jeopardizes the health and well-being of the dogs and should not be allowed.

I truly believe all such facilities should be closed as they are a drain on the entire tax payor system and no good comes from the breeding of more animals other than in the pockets of the owners of such businesses. But in the mean time, we need to better the lives of the poor dogs and cats being forced to breed.

Lisa M. Cassell, CPA
Controller

RPD Ltd.
428 Hemphill Street
Fort Worth, TX 76104
817-665-2160

Pauline Easley

From: RESPONSIBLE PET OWNERS ALLIANCE [REDACTED]
Sent: Wednesday, June 08, 2016 4:51 PM
To: Erule Comments
Subject: Licensed Breeders Program

Dear Sir:

Is e-mail the only way to comment on re-adopting, revising or repealing the licensed breeders program?

Do you open attached files?

I would prefer to mail my comments.

Where should I mail them to and attention to whom?

Mary Beth Duerler

Pauline Easley

From: Mccarty, Warren [REDACTED]
Sent: Wednesday, June 08, 2016 4:51 PM
To: Erule Comments
Subject: THLN

I believe in your cause, I hope you have success with your legislation and no matter what happens keep fighting the good fight animals need a voice to.

Sent from my iPhone

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Pauline Easley

From: [REDACTED]
Sent: Wednesday, June 08, 2016 3:26 PM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

In particular, I respectfully urge the Department to propose rules to afford breeding dogs more cage space, require a solid resting surface and ban the unsafe and unsanitary practice of stacking dogs' cages on top of one another. Breeding dogs typically spend their entire lives in these cages so these modest improvements are critical to ensuring a basic standard of wellbeing and safety for them.

Please take these modest steps to improve the lives of thousands of dogs stuck in awful puppy mills their entire lives and make Texas a more humane state.

Thank you for your consideration.

Sincerely,

Sarah Pruiett

Pauline Easley

From: [REDACTED]
Sent: Wednesday, June 08, 2016 3:24 PM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

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Please take this seriously. These dogs live in misery.

Thank you for your consideration.

Sincerely,

Brandi Bevans

Pauline Easley

From: [REDACTED]
Sent: Wednesday, June 08, 2016 3:13 PM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

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Thank you for your consideration.

Sincerely,

Rebecca Casso

Pauline Easley

From: Adalis Cardenas [REDACTED]
Sent: Wednesday, June 08, 2016 2:55 PM
To: Erule Comments
Subject: Licensed Breeder Rules

Dear TDLR,

We as Texans have taken a step in the right direction by passing legislation that I personally hope will put an end to puppy mills in our great state. We must now ensure that the pertinent rules and standards are robust in sending the message that Texas will not be a puppy mill haven and as such our state will ensure the well-being of animals in breeding facilities. In order to achieve this, the following rules should be in place and enforced:

- Animals should be prohibited from being kept in an outdoor facility when the temperature reaches more than 90 degrees or less than 50 degrees.
- Current rules provide an insufficient space for a dog's comfort and barely allows enough room for the animal to turn around. The minimum space should be doubled and TDLR should adopt the increased size recommended by the Advisory Committee when the initial Rules were considered.
- Dogs and cats should not be forced to stand or lie 24/7 on 100% wire or wire mesh for their entire lives. Among other problems, this can result in severe damage to their limbs, paws and is highly unsanitary.
- Stacking of primary dog enclosures on top of one another jeopardizes the health and well-being of the dogs and should not be allowed.

I urge TDLR to set these standards to ensure that animals in any Texas breeding facility do not exist in suffering and abusive conditions.

Kind regards,
Adalis Cardenas
1640 Breezy Cv
Round Rock, TX

Pauline Easley

From: [REDACTED]
Sent: Wednesday, June 08, 2016 2:36 PM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

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God put mankind over animals to care for them not to abuse them for monetary gain. Inhumane conditions must stop. Please help.

Thank you for your consideration.

Sincerely,

Suzanne Jackson

Pauline Easley

From: [REDACTED]
Sent: Wednesday, June 08, 2016 2:35 PM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

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Texas needs to take action. We need to serve as a role model for states who care about the treatment of animals and legislate against puppy mills.

Thank you for your consideration.

Sincerely,

Carolyn Walters

Pauline Easley

From: [REDACTED]
Sent: Wednesday, June 08, 2016 2:29 PM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

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Thank you for your consideration.

Sincerely,

Shirley Dykhuis

Pauline Easley

From: [REDACTED]
Sent: Wednesday, June 08, 2016 2:26 PM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

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I don't think this should even take place at all. Puppy Mills are deplorable and need to be stopped and against the law with some major consequences if they do not abide by the law.

The government (President) started this during depression, and now they need to end it.

No one should suffer and that includes animals, especially since they cannot defend themselves.

Do the right thing - stop this terrible form of animal cruelty.

Thank you for your consideration.

Sincerely,

Tammy J Beene

Pauline Easley

From: [REDACTED]
Sent: Wednesday, June 08, 2016 2:15 PM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

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Thank you for your consideration.

Sincerely,

Jessica Sorano

Pauline Easley

From: Spencer, Anne [REDACTED]
Sent: Wednesday, June 08, 2016 2:11 PM
To: Erule Comments
Subject: Please strengthen existing legislation that will help protect animals living in breeding facilities

I support efforts of the Texas Humane Legislative Network, and of my state representative, Kenneth Sheets, to mandate that ALL animals living with breeders are treated in the most humane manner possible. Many still are not. It is heartbreaking to know that there are still abuses going on.

I support these measures:

- Animals should be prohibited from being kept in an outdoor facility when the temperature reaches more than 90 degrees or less than 50 degrees.
- Current rules provide an insufficient space for a dog's comfort and barely allows enough room for the animal to turn around. The minimum space should be doubled and TDLR should adopt the increased size recommended by the Advisory Committee when the initial Rules were considered.
- Dogs and cats should not be forced to stand or lie 24/7 on 100% wire or wire mesh for their entire lives. Among other problems, this can result in severe damage to their limbs, paws and is highly unsanitary.
- Stacking of primary dog enclosures on top of one another jeopardizes the health and well-being of the dogs and should not be allowed.

Please take the appropriate action necessary to ensure that no animal, who is already forced to breed, will have to endure reprehensible conditions throughout his life.

Anne Spencer
CBRE | Office Services
200 Concord Plaza, Suite 800 | San Antonio, TX 78216
T 210 507 1130 | C 619 793 7674
[REDACTED] | www.cbre.com/anne.spencer

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Pauline Easley

From: [REDACTED]
Sent: Wednesday, June 08, 2016 2:10 PM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

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One would imagine humanity came equipped with instincts of comfort, wellbeing and fairness to critters who depend upon us for their well being. It's a mark of sadness that this is not the case since dollar worship can and does hurts others.

The notion that dogs can be treated in the same way one would stack cans, cardboard or other disposable commodities on a grocery or factory shelf, is cruel and wrong.

We need to show concern for living creatures that depend upon humans for care and kindness. That concern is also a model for young people who we hope will grow into reasonable and kind adults. Anything less is horrific.

Thank you for representing what Texas stand for: Humane Standards.

Thank you for your consideration.

Sincerely,

Jacquie Dodes-Walter

Pauline Easley

From: Anne Spencer [REDACTED]
Sent: Wednesday, June 08, 2016 2:09 PM
To: Erule Comments
Subject: Please strengthen existing legislation that will help protect animals living in breeding facilities

I support efforts of the Texas Humane Legislative Network, and of my state representative, Kenneth Sheets, to mandate that ALL animals living with breeders are treated in the most humane manner possible. Many still are not. It is heartbreaking to know that there are still abuses going on.

I support these measures:

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- Stacking of primary dog enclosures on top of one another jeopardizes the health and well-being of the dogs and should not be allowed.

Please take the appropriate action necessary to ensure that no animal, who is already forced to breed, will have to endure reprehensible

conditions throughout his life.

Many thanks,

Anne Spencer | Co-Owner
BeatComber | San Antonio, TX
619 793 7674 | [REDACTED]



Pauline Easley

From: Anne Spencer [REDACTED]
Sent: Wednesday, June 08, 2016 2:09 PM
To: Erule Comments
Subject: Please strengthen existing legislation that will help protect animals living in breeding facilities

I support efforts of the Texas Humane Legislative Network, and of my state representative, Kenneth Sheets, to mandate that ALL animals living with breeders are treated in the most humane manner possible. Many still are not. It is heartbreaking to know that there are still abuses going on.

I support these measures:

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- Stacking of primary dog enclosures on top of one another jeopardizes the health and well-being of the dogs and should not be allowed.

Please take the appropriate action necessary to ensure that no animal, who is already forced to breed, will have to endure reprehensible

conditions throughout his life.

--

Anne C. Spencer
1342 Crown Brk. | San Antonio, TX | 78260
[REDACTED] | 619 793 7674

Pauline Easley

From: [REDACTED]
Sent: Wednesday, June 08, 2016 2:05 PM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

In particular, I respectfully urge the Department to propose rules to afford breeding dogs more cage space, require a solid resting surface and ban the unsafe and unsanitary practice of stacking dogs' cages on top of one another. Breeding dogs typically spend their entire lives in these cages so these modest improvements are critical to ensuring a basic standard of wellbeing and safety for them.

Thank you for your consideration.

Sincerely,

Wendy Beyda

Pauline Easley

From: Paul Koning [REDACTED]
Sent: Wednesday, June 08, 2016 1:50 PM
To: Erule Comments
Subject: Licensed Breed Rules

Good afternoon. I understand the Department is reviewing the Licensed Breeder Rules for possible amendment. I encourage the department to upgrade the rules to provide more meaningful protection for the confined animals. In particular, the following changes would be in furtherance of the policy underlying the rules.

- The Rules should prohibit keeping animals in an outdoor facility when the temperature reaches more than 90 degrees or less than 50 degrees.
- Current rules provide an insufficient space for a dog's comfort and barely allows enough room for the animal to turn around. The minimum space should be doubled and TDLR should adopt the increased size recommended by the Advisory Committee when the initial Rules were considered.
- Dogs and cats should not be forced to stand or lie 24/7 on 100% wire or wire mesh for their entire lives. Among other problems, this can result in severe damage to their limbs, paws and is highly unsanitary.
- Stacking of primary dog enclosures on top of one another jeopardizes the health and well-being of the dogs and should not be allowed.

Thanks very much for addressing these important changes.

Paul Koning
Koning Rubarts LLP
1700 Pacific Ave., Suite 4500
Dallas, Texas 75201
214.751.7901 (direct)

[REDACTED]
 KONING RUBARTS^{LLP}



Named one of *D Magazine's*
Best Lawyers in Dallas

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Pauline Easley

From: Ruth Chambers [REDACTED]
Sent: Wednesday, June 08, 2016 1:37 PM
To: Erule Comments
Subject: Please strengthen existing legislation that will help protect animals living in breeding facilities

I support efforts of the Texas Humane Legislative Network, and of my state representative, Kenneth Sheets, to mandate that ALL animals living with breeders are treated in the most humane manner possible. Many still are not. It is heartbreaking to know that there are still abuses going on.

I support these measures:

- Animals should be prohibited from being kept in an outdoor facility when the temperature reaches more than 90 degrees or less than 50 degrees.
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- Stacking of primary dog enclosures on top of one another jeopardizes the health and well-being of the dogs and should not be allowed.

Please take the appropriate action necessary to ensure that no animal, who is already forced to breed, will have to endure reprehensible conditions throughout his life.

Many thanks,

Ruth Secker Chambers
7010 Wildgrove Ave
Dallas, TX 75214
214-505-4348

Pauline Easley

From: [REDACTED]
Sent: Wednesday, June 08, 2016 1:28 PM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

In particular, I respectfully urge the Department to propose rules to afford breeding dogs more cage space, require a solid resting surface and ban the unsafe and unsanitary practice of stacking dogs' cages on top of one another. Breeding dogs typically spend their entire lives in these cages so these modest improvements are critical to ensuring a basic standard of wellbeing and safety for them.

There is simply no excuse for puppy mills! There are so many wonderful dogs available through rescue groups, most having been fully vetted. Puppy mills are in business only to make money and churn out as many animals as they can through inbreeding and without decent care for the parents. All puppy mills should be outlawed!

Thank you for your consideration.

Sincerely,

Patricia Honsberger

Pauline Easley

From: Shar [REDACTED]
Sent: Wednesday, June 08, 2016 1:26 PM
To: Erule Comments
Subject: TDLR Dog & Cat Breeder Licensing

What a huge waste of tax dollars. The laws that govern animals should stay with the agriculture department. There is too much government tripping over the same laws. If you want to help the over population of Dogs stop the importing of stray dogs from all continents. The over-population is manufactured by the Extremist groups of the HSUS. HSUS is not animal friendly, less than 1% of contributions go to the Well Fare of animals.
Sharleen Pelzl

Sent from [Mail](#) for Windows 10

Pauline Easley

From: [REDACTED]
Sent: Wednesday, June 08, 2016 1:25 PM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

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Thank you for your consideration.

Sincerely,

Susan Deans-Smith

Pauline Easley

From: [REDACTED]
Sent: Wednesday, June 08, 2016 1:22 PM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

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These poor dogs NEED our help!!!!

Thank you for your consideration.

Sincerely,

MARIE MORENO

Pauline Easley

From: [REDACTED]
Sent: Wednesday, June 08, 2016 1:10 PM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

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Thank you for your consideration.

Sincerely,

Annita Oxford

Pauline Easley

From: [REDACTED]
Sent: Wednesday, June 08, 2016 1:08 PM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

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Dear Sir or Maam:

I beg of you to give these creatures a humane life existence. I live here in the great state of Texas and we have quite a few dogs and cats in our home that we lovingly care for. Please let Texas be known as a state that loves and cares for their animals. I am a conservative and grow so weary of the sides many seem to take as if this should be a liberal or conservative issue. It should be neither. It should be a common cause all of us as fellow sojourners on this earth should take. I so appreciate you taking the time to view my note here and ask that you would please consider helping our creatures. God's Creatures.

Thank you for your consideration.

Sincerely,

Amelia Orlando

Pauline Easley

From: [REDACTED]
Sent: Wednesday, June 08, 2016 1:07 PM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

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Thank you for your consideration.

Sincerely,

Amelia Orlando

Pauline Easley

From: [REDACTED]
Sent: Wednesday, June 08, 2016 1:02 PM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

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Thank you for your consideration.

Sincerely,

Reynaldo reyna

Pauline Easley

From: [REDACTED]
Sent: Wednesday, June 08, 2016 1:01 PM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

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Animals should be provided safe comfortable place to reside, clean water, good food, proper medical attention, and let out of their kennels/runs daily to interact with nature, people, and other animals. Living entire life in a small cage is INHUMANE and should not be tolerated. People should not be allowed to abuse animals for any reason.

Thank you for your consideration.

Sincerely,

Linda Knowlson

Pauline Easley

From: [REDACTED]
Sent: Wednesday, June 08, 2016 12:54 PM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

In particular, I respectfully urge the Department to propose rules to afford breeding dogs more cage space, require a solid resting surface and ban the unsafe and unsanitary practice of stacking dogs' cages on top of one another. Breeding dogs typically spend their entire lives in these cages so these modest improvements are critical to ensuring a basic standard of wellbeing and safety for them.

Imagine for a second what it would feel like if you were kept in a small room where you barely fit with no water or food....without love... without hope.....This is what these innocent animals have to go through. Please make a difference for these beautiful animals, they don't deserve to be treated this way... no one does.... People see them as just plain animals, but they're not. They are friends and family as well. When you come home to them, they give you a big welcome, when you feel sad, they cuddle with you making everything feel better, even if you punish them for something bad they did, they forgive you and waggle their tail, they make you feel special. They really are loyal. We can learn a lot from these amazing animals, no matter what animal it is, they all deserve to be with a loving family, not in a cage or be treated harmfully. We can make a difference in the world, Please help protect these animals have a better life ! You can do it!.

Thank you for your consideration.

Sincerely,

melissa rodriguez

Pauline Easley

From: [REDACTED]
Sent: Wednesday, June 08, 2016 12:43 PM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

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Please help these animals that can't help themselves. It's horrific the conditions and treatment so many of them have to live under. There are WAY too many homeless that are lovable beyond belief .. why do we over populate an already over populated animal kingdom?

Thank you for your consideration.

Sincerely,

Becky. Burnside

Pauline Easley

From: [REDACTED]
Sent: Wednesday, June 08, 2016 12:34 PM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

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Thank you for your consideration.

Sincerely,

Rebecca Flournoy

Pauline Easley

From: Lisa Stevens [REDACTED]
Sent: Wednesday, June 08, 2016 12:14 PM
To: Erule Comments
Subject: Strengthen protections for animals used in breeding operations such as puppy mills

Licensed breeder rules are very minimal, and are insufficient to provide humane living conditions for the dogs, cats, and other pet animals that these people use to produce animals for sale. I wish it were not necessary to regulate anyone, but humans are greedy and lazy and often treat living things as product and property only.

Please beef up the existing requirements regarding backyard breeders:

No wire cage bottoms, no stacking of cages on top of other occupied cages, and more space for the animals to move around and stretch out to lie down.

If temperatures exceed 90-95 in the summer and go below 40 in the winter they need indoor or sheltered space including wind breaks and shade.

It is the MINIMUM they should do for these creatures. I have attended meetings addressing regulation of such operations, and the people who spoke on behalf of their businesses scared me with their anger and insensitivity to the conditions in which they regularly keep their "property".

Thank you very much,
Lisa Stevens
12032 Lincolnshire Dr
Austin, Texas 78758

Pauline Easley

From: Leia Lineberger [REDACTED]
Sent: Wednesday, June 08, 2016 11:28 AM
To: Erule Comments
Subject: Public Comment on Licensed Breeder Rule Review

Dear Sir or Ma'am,

The Texas Department of Licensing and Regulation (TDLR) is charged with adopting rules to "ensure the overall health, safety and well-being of each individual animal" in a licensed breeder facility. I am a long-time advocate for humane legislation and a voice for animals. I currently volunteer with the SPCA of Texas and the Texas Humane Legislation Network. I am a proud dog owner myself, and have a wealth of experience with animals. I have also previously worked as a public servant for the State of Texas as an Advisor to Governor Rick Perry. As you are currently accepting public comment on the review of licensed breeder rules for the first time since 2011, I wanted to provide the following feedback:

- Animals should be prohibited from being kept in an outdoor facility when the temperature reaches more than 90 degrees or less than 50 degrees.
- Current rules provide an insufficient space for a dog's comfort and barely allow for the animal to turn around. The minimum space should be doubled and TDLR should adopt the increased size recommended by the Advisory Committee when the initial Rules were adopted.
- Dogs and cats should not be forced to stand or lie 24/7 on 100% wire or wire mesh for any portion of their lives. Among other problems, this can result in severe damage to their limbs and paws, and is highly unsanitary.
- Stacking of primary dog enclosures on top of one another jeopardizes the health and sanity and well-being of the dogs and should not be allowed under any circumstances.

It is incredible to me that some breeders are so solely focused on financial gain that they have such little regard for the living, breathing, and feeling creatures they are selling. Our public servants are tasked with ensuring the well-being of the people of our State, and I believe that we should protect our animals through enacting humane legislation as well. I respectfully ask you to consider adopting these very basic rules that are truly based on common sense. Our compassion for animals is a reflection of who we are as a society, and I have the utmost faith that our public leaders in Texas embody that spirit.

Many thanks in advance for your consideration and compassion.

Respectfully,

Leia K. Lineberger
Dallas, TX
Cell: 714-785-2947
[REDACTED]

Pauline Easley

From: [REDACTED]
Sent: Wednesday, June 08, 2016 11:14 AM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

In particular, I respectfully urge the Department to propose rules to afford breeding dogs more cage space, require a solid resting surface and ban the unsafe and unsanitary practice of stacking dogs' cages on top of one another. Breeding dogs typically spend their entire lives in these cages so these modest improvements are critical to ensuring a basic standard of wellbeing and safety for them.

Thank you for your consideration.

Sincerely,

Jennifer Gabriel-MacDonald

Pauline Easley

From: [REDACTED]
Sent: Wednesday, June 08, 2016 11:10 AM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

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Thank you for your consideration.

Sincerely,

Stephanie Murdoch

Pauline Easley

From: Kelli alexander [REDACTED]
Sent: Wednesday, June 08, 2016 11:05 AM
To: Erule Comments
Subject: Tighten the laws!

TDLR must strengthen the laws on regulating "puppy mills."

It's hard to fathom why this must take such time and research to figure out : companion animals need our protection from those that profit from their unwilling "use".

Please, tighten the reins on these "businesses" that care not for the lives of the animals they keep, but only for the almighty dollar.

Would you keep YOUR pets in the the draconian fashion as puppy breeders?

Laws should include:

- Animals should be prohibited from being kept in an outdoor facility when the temperature reaches more than 90 degrees or less than 50 degrees.
- Current rules provide an insufficient space for a dog's comfort and barely allows enough room for the animal to turn around. The minimum space should be doubled and TDLR should adopt the increased size recommended by the Advisory Committee when the initial Rules were considered.
- Dogs and cats should not be forced to stand or lie 24/7 on 100% wire or wire mesh for their entire lives. Among other problems, this can result in severe damage to their limbs, paws and is highly unsanitary.
- Stacking of primary dog enclosures on top of one another jeopardizes the health and well-being of the dogs and should not be allowed.

Thank you,

Kelli Alexander
No Kill Denton County
940-390-4161

Pauline Easley

From: [REDACTED]
Sent: Wednesday, June 08, 2016 10:13 AM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

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As the parent of a puppy mill rescue, I have seen first hand how terrified these pups are even though they are safe. I can only imagine the treatment my Louie endured for three long years. Please stop the puppy mill madness!!!

Thank you for your consideration.

Sincerely,

Linda Weiss

Pauline Easley

From: [REDACTED]
Sent: Wednesday, June 08, 2016 10:12 AM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

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Please protect our fur babies !

Thank you for your consideration.

Sincerely,

Ronda Beinfeld

Pauline Easley

From: [REDACTED]
Sent: Wednesday, June 08, 2016 10:07 AM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

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Thank you for your consideration.

Sincerely,

Erica Brown

Pauline Easley

From: [REDACTED]
Sent: Wednesday, June 08, 2016 10:02 AM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

In particular, I respectfully urge the Department to propose rules to afford breeding dogs more cage space, require a solid resting surface and ban the unsafe and unsanitary practice of stacking dogs' cages on top of one another. Breeding dogs typically spend their entire lives in these cages so these modest improvements are critical to ensuring a basic standard of wellbeing and safety for them.

Please, please take the time to review these standards and really understand how horrible the current conditions are for animals. I can't bare to think about the animals in these conditions especially having two dogs of my own. I couldn't imagine them having to live in these conditions and I hope that we are able to change things for the better!

Thank you for your consideration.

Sincerely,

Tricia Fleming

Pauline Easley

From: [REDACTED]
Sent: Wednesday, June 08, 2016 9:47 AM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

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I think the whole idea of the puppy mill is dispicable!
It is my hope that one day they will not exist at all!
We as a people need to stop breeding dogs and saving the ones in shelters!

That being said, how about cages described above and mandating that the building have skylights and conditioned/heated air -
at a BARE MINIMUM?!!! What about a radio to keep their minds focused on something besides the cries and moans of the sufferers all around them?!!! What about letting mom rest and sit one heat out once in a while - and NOT discard her like yesterday's trash when she can no longer bear offspring?!!!

I could go on and on here. Please hear our cries and help these babies that cannot speak up for themselves!

Thank you for your consideration.

Sincerely,

Dreama Griffin

Pauline Easley

From: [REDACTED]
Sent: Wednesday, June 08, 2016 9:43 AM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

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Thank you for your consideration.

Sincerely,

Ray Yow

Pauline Easley

From: [REDACTED]
Sent: Wednesday, June 08, 2016 9:39 AM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

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I have been a member of the ASPCS for five years and am amazed at the work they do on behalf of those that do not have a voice. As a civilized society we have laws to protect crimes against persons and specific laws to protect children. Why can we not protect the one living creature we invite to live with us in our homes? I am a Native Texan and have served in the United States Marine Corps. I was proud I was from Texas then, and I still defend her today. If a person wants to breed dogs and cats in Texas there should be a minimum standard for safety and health. So, I encourage TDLR to strengthen the necessary regulation to protect so many.

Thank you for your consideration.

Sincerely,

Brad Lewis

Pauline Easley

From: [REDACTED]
Sent: Wednesday, June 08, 2016 9:26 AM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

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Please! Do what's right by these innocent animals. THIS can be controlled here!

Thank you for your consideration.

Sincerely,

Kristin Tarrence

Pauline Easley

From: [REDACTED]
Sent: Wednesday, June 08, 2016 9:07 AM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

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Thank you for your consideration.

Sincerely,

Cassie Franklin

Pauline Easley

From: [REDACTED]
Sent: Wednesday, June 08, 2016 8:55 AM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

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Often times, these dogs simply die of diseases and are certainly not treated with the proper care they certainly deserve! I plead with the Department in changing guidelines and laws to accommodate a safer, cleaner, and healthier environment. Thank you so much for hearing our voices!

Thank you for your consideration.

Sincerely,

Karen Baldwin

Pauline Easley

From: [REDACTED]
Sent: Wednesday, June 08, 2016 8:57 AM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

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Please help our BEST FRIEND! They cannot help themselves.

Ken Suttles

Thank you for your consideration.

Sincerely,

Kenneth SUTTLES

Pauline Easley

From: [REDACTED]
Sent: Wednesday, June 08, 2016 8:46 AM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

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Thank you for your consideration.

Sincerely,

Allison Sciaraffa

Pauline Easley

From: [REDACTED]
Sent: Wednesday, June 08, 2016 8:43 AM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

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Thank you for your consideration.

Sincerely,

Sunny Roberts

Pauline Easley

From: [REDACTED]
Sent: Wednesday, June 08, 2016 8:25 AM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

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Thank you for your consideration.

Sincerely,

Maia Jennejahn

Pauline Easley

From: [REDACTED]
Sent: Wednesday, June 08, 2016 8:12 AM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

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Thank you for your consideration.

Sincerely,

Billie Brooks

Pauline Easley

From: [REDACTED]
Sent: Wednesday, June 08, 2016 8:00 AM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

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Thank you for your consideration.

Sincerely,

Nisha Cherian

Pauline Easley

From: [REDACTED]
Sent: Wednesday, June 08, 2016 7:30 AM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

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Thank you for your consideration.

Sincerely,

Teresa Lensch

Pauline Easley

From: Lenny Lind [REDACTED]
Sent: Wednesday, June 08, 2016 6:48 AM
To: Erule Comments
Subject: Supporting Puppy Mill Legislation

To the Texas Department of Licensing and Legislation

I am writing in strong support of strengthening the rules and regulations for puppy mill owners. Although some improvements have been made with the passage of puppy mill legislation in 2011, much more needs to be done to protect these dogs and puppies. Many owners of these animals, who are interested only in the money they can make from breeding, will not provide basic care and sanitation for their dogs.

I support laws that will protect animals from being kept in unsafe temperatures, kept from being kept in kennels that provide only wire or wire mesh floors, and small and stacked cages.

Sincerely,

Leonard Lind

Pauline Easley

From: [REDACTED]
Sent: Wednesday, June 08, 2016 2:23 AM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

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Thank you for your consideration.

Sincerely,

Hilary Starks

Pauline Easley

From: [REDACTED]
Sent: Wednesday, June 08, 2016 2:18 AM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

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Thank you for your consideration.

Sincerely,

Alicea Campos

Pauline Easley

From: Jane [REDACTED]
Sent: Wednesday, June 08, 2016 1:45 AM
To: Erule Comments
Subject: Puppy Mill standards

The following standards **MUST** be strengthened!

- Animals should be prohibited from being kept in an outdoor facility when the temperature reaches more than 90 degrees or less than 50 degrees.
- Current rules provide an insufficient space for a dog's comfort and barely allows enough room for the animal to turn around. The minimum space should be doubled and TDLR should adopt the increased size recommended by the Advisory Committee when the initial Rules were considered.
- Dogs and cats should not be forced to stand or lie 24/7 on 100% wire or wire mesh for their entire lives. Among other problems, this can result in severe damage to their limbs, paws and is highly unsanitary.
- Stacking of primary dog enclosures on top of one another jeopardizes the health and well-being of the dogs and should not be allowed.

I have personally assisted in staging areas after puppy mills have been shut down and seen firsthand the conditions in which these animals lived. I have attended auctions held at puppy mills and rescued and placed (and also, on occasion, personally adopted) the victims of atrocious abuse inflicted upon these poor creatures. You cannot imagine the lack of care and resulting emotional and physical scars these animals have that last a lifetime. PLEASE increase the standards until we can drive these horrible people completely out of business.

Thank you,
Jane Arrington

Do you care? Please help a homeless Coton.
<http://www.cotonrescue.us>
UCARE - a 501(c)3 non-profit organization

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Pauline Easley

From: [REDACTED]
Sent: Wednesday, June 08, 2016 12:49 AM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

In particular, I respectfully urge the Department to propose rules to afford breeding dogs more cage space, require a solid resting surface and ban the unsafe and unsanitary practice of stacking dogs' cages on top of one another. Breeding dogs typically spend their entire lives in these cages so these modest improvements are critical to ensuring a basic standard of wellbeing and safety for them.

Thank you for your consideration.

Sincerely,

Nicola Jaeger

Pauline Easley

From: [REDACTED]
Sent: Wednesday, June 08, 2016 12:22 AM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

In particular, I respectfully urge the Department to propose rules to afford breeding dogs more cage space, require a solid resting surface and ban the unsafe and unsanitary practice of stacking dogs' cages on top of one another. Breeding dogs typically spend their entire lives in these cages so these modest improvements are critical to ensuring a basic standard of wellbeing and safety for them.

PLEASE help these sweet souls & if you can't put an end to the horrific lives they have to live by stopping puppy mill breeders all together in the great state of Texas at least make their conditions more comfortable.

Thank you for your consideration.

Sincerely,

Jill Fischer

Pauline Easley

From: [REDACTED]
Sent: Wednesday, June 08, 2016 12:15 AM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

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Thank you for your consideration.

Sincerely,

Jessica Kennedy

Pauline Easley

From: [REDACTED]
Sent: Wednesday, June 08, 2016 12:14 AM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

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Thank you for your consideration.

Sincerely,

Chelsey Daniel

Pauline Easley

From: [REDACTED]
Sent: Tuesday, June 07, 2016 11:37 PM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

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Thank you for your consideration.

Sincerely,

Beverly Callaway

Pauline Easley

From: [REDACTED]
Sent: Tuesday, June 07, 2016 11:27 PM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

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Thank you for your consideration.

Sincerely,

Jane Leal

Pauline Easley

From: [REDACTED]
Sent: Tuesday, June 07, 2016 11:11 PM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

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It is time for strict regulations with stiff fines and jail time puts an end to animal suffering at the hands of greedy individuals who would use and abuse living things for profit and gain. It is time also to make it illegal to sell dogs, cats and other domestic animals in pet shops, thus creating the market for animals bred in cruelty mills. If decent human beings don't create serious negative incentive for the existence of these concentration camps, they will continue to flourish. Please do the right thing and put some bite into laws to prevent animal abuse.

Thank you for your consideration.

Sincerely,

Debbie Baird

Pauline Easley

From: [REDACTED]
Sent: Tuesday, June 07, 2016 11:04 PM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

In particular, I respectfully urge the Department to propose rules to afford breeding dogs more cage space, require a solid resting surface and ban the unsafe and unsanitary practice of stacking dogs' cages on top of one another. Breeding dogs typically spend their entire lives in these cages so these modest improvements are critical to ensuring a basic standard of wellbeing and safety for them.

It is unfair and inhumane to keep dogs in this condition.

Thank you for your consideration.

Sincerely,

Joan Parsley

Pauline Easley

From: [REDACTED]
Sent: Tuesday, June 07, 2016 10:39 PM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

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Thank you for your consideration.

Sincerely,

Stephanie Burger

Pauline Easley

From: [REDACTED]
Sent: Tuesday, June 07, 2016 10:26 PM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

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Thank you for your consideration.

Sincerely,

Leslie Rigoulot

Pauline Easley

From: [REDACTED]
Sent: Tuesday, June 07, 2016 10:23 PM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

In particular, I respectfully urge the Department to propose rules to afford breeding dogs more cage space, require a solid resting surface and ban the unsafe and unsanitary practice of stacking dogs' cages on top of one another. Breeding dogs typically spend their entire lives in these cages so these modest improvements are critical to ensuring a basic standard of wellbeing and safety for them.

There should also be laws against using dogs as machines (breeding purpose only). It is extremely inhuman.

Thank you for your consideration.

Sincerely,

Tanya Williams

Pauline Easley

From: [REDACTED]
Sent: Tuesday, June 07, 2016 10:19 PM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

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Please help us give a voice to those who don't have one. We are their only hop.

Thank you for your consideration.

Sincerely,

Maria Silva

Pauline Easley

From: [REDACTED]
Sent: Tuesday, June 07, 2016 9:55 PM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

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Thank you for your consideration.

Sincerely,

Rebecca Witt

Pauline Easley

From: [REDACTED]
Sent: Tuesday, June 07, 2016 9:55 PM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

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Thank you for your consideration.

Sincerely,

Marjan Malekzadeh

Pauline Easley

From: [REDACTED]
Sent: Tuesday, June 07, 2016 9:54 PM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

In particular, I respectfully urge the Department to propose rules to afford breeding dogs more cage space, require a solid resting surface and ban the unsafe and unsanitary practice of stacking dogs' cages on top of one another. Breeding dogs typically spend their entire lives in these cages so these modest improvements are critical to ensuring a basic standard of wellbeing and safety for them.

With so many dogs being euthanized, I would like to see more stringent rules on the amount of dogs bred. Please change the conditions these dogs live in and the amount of dogs they can breed each year.

Thank you for your consideration.

Sincerely,

Glenda Straub

Pauline Easley

From: [REDACTED]
Sent: Tuesday, June 07, 2016 9:30 PM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

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Thank you for your consideration.

Sincerely,

Lindsey Densing

Pauline Easley

From: [REDACTED]
Sent: Tuesday, June 07, 2016 9:23 PM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

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Thank you for your consideration.

Sincerely,

Tina Lewis

Pauline Easley

From: [REDACTED]
Sent: Tuesday, June 07, 2016 9:11 PM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

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Deployable in this day and age, people are allowed to torture and use these animals. I hope one day this kind of business if you can call it that!!! Will be a federal crime. These animals are like innocent children. I will fight for these animals until the day I die.

Thank you for your consideration.

Sincerely,

MaryAnn Lower

Pauline Easley

From: [REDACTED]
Sent: Tuesday, June 07, 2016 9:09 PM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

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Thank you for your consideration.

Sincerely,

Catherine Theiss

Pauline Easley

From: [REDACTED]
Sent: Tuesday, June 07, 2016 8:45 PM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

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Please consider carefully the plight of these animals who are completely dependent on you for healthy living conditions.

Thank you for your consideration.

Sincerely,

Sally Hill

Pauline Easley

From: [REDACTED]
Sent: Tuesday, June 07, 2016 8:34 PM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

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Thank you for your consideration.

Sincerely,

Robyn Zymowski

Pauline Easley

From: [REDACTED]
Sent: Tuesday, June 07, 2016 7:54 PM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

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Thank you for your consideration.

Sincerely,

Sylvia Ponce

Pauline Easley

From: [REDACTED]
Sent: Tuesday, June 07, 2016 7:43 PM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

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Thank you for your consideration.

Sincerely,

Edgar Locklear

Pauline Easley

From: [REDACTED]
Sent: Tuesday, June 07, 2016 6:22 PM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

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Thank you for your consideration.

Sincerely,

Barb Wheeler

Pauline Easley

From: [REDACTED]
Sent: Tuesday, June 07, 2016 6:08 PM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

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I am a rescue mom, one of my dogs came from a puppy mill. Fortunately he was rescued at 1-years old but we fought a long hard road to get him socialized and adjusted to living in our home. The only home he ever knew for his for year of life was a small wire cage that he shared with several sibling. This cage was never cleaned out, the pups were covered in their own feces. I could go on but instead I plead with you all to enforce laws that have these horror mills treat these animals as companion animals and not livestock.

Thank you for your consideration.

Sincerely,

Cyndy Tomaino

Pauline Easley

From: [REDACTED]
Sent: Tuesday, June 07, 2016 5:58 PM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

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Thank you for your consideration.

Sincerely,

Sean chilcote

Pauline Easley

From: [REDACTED]
Sent: Tuesday, June 07, 2016 5:50 PM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

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Thank you for your consideration.

Sincerely,

Erick Ascencio

Pauline Easley

From: [REDACTED]
Sent: Tuesday, June 07, 2016 5:43 PM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

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I also feel that regulations should be put in place limiting the number of litters a dog or cat can have during their lifetime.

Thank you for your consideration.

Sincerely,

Earlene Bellingham

Pauline Easley

From: [REDACTED]
Sent: Tuesday, June 07, 2016 5:30 PM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

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Thank you for your consideration.

Sincerely,

Kristina Lamons

Pauline Easley

From: [REDACTED]
Sent: Tuesday, June 07, 2016 5:22 PM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

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Please,,, No cage stacking. So many puppies come from these places already sick. Very important to require the puppies must be healthy with no infections.

Thank you for your consideration.

Sincerely,

Robert Fox

Pauline Easley

From: [REDACTED]
Sent: Tuesday, June 07, 2016 5:19 PM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

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Thank you for your consideration.

Sincerely,

Maria Rendon Hughes

Pauline Easley

From: [REDACTED]
Sent: Tuesday, June 07, 2016 5:17 PM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

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I would recommend that the animals are required to have time each day to exercise outside of their cage and socialize with other animals.

Thank you for your consideration.

Sincerely,

Larry Good

Pauline Easley

From: [REDACTED]
Sent: Tuesday, June 07, 2016 5:15 PM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

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I feel that is the least you can do for these poor, caged animals!

Thank you for your consideration.

Sincerely,

Linda Pichardo

Pauline Easley

From: [REDACTED]
Sent: Tuesday, June 07, 2016 5:05 PM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

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I am saddened by the fact that Texas allows commercial breeding of dogs, considering the number of dogs in the pound who are in need of homes. Since it is legal, I urge you to ban the dangerous practice of stacking dogs' cages. Please develop laws that will allow dogs live in sanitary conditions, to have room to run, play, eat a healthy diet, and to have room to exhibit natural behaviors. Dogs having given Man immeasurable companionship and hard work, and they deserve to be treated with respect.

Thank you for your consideration.

Sincerely,

Thanh Tran

Pauline Easley

From: [REDACTED]
Sent: Tuesday, June 07, 2016 5:00 PM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

In particular, I respectfully urge the Department to propose rules to afford breeding dogs more cage space, require a solid resting surface and ban the unsafe and unsanitary practice of stacking dogs' cages on top of one another. Breeding dogs typically spend their entire lives in these cages so these modest improvements are critical to ensuring a basic standard of wellbeing and safety for them.

Please act on this to further protect dogs!

Thank you for your consideration.

Sincerely,

Julie Wilson

Pauline Easley

From: [REDACTED]
Sent: Tuesday, June 07, 2016 4:58 PM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

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Thank you for your consideration.

Sincerely,

Crystal King

Pauline Easley

From: [REDACTED]
Sent: Tuesday, June 07, 2016 4:52 PM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

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I support the statements above and would like to add that I would like to see Kennels are more adequate such as those in respectable animal shelters with exercise area. Should be limit on the number of breeding pairs that can be owned, establish a limited number of litters a female may have and, then either adopt her out , sell, or retire her so that she can live a happy life with a family that can love her for her and not for the love of money.. Also I think there should be stiffer penalties for those who violate the establish regulations.

There should also be an inspection of the facilities PRIOR to issuing a permit/license to a breeder to ensure that they are in compliance with establish regulations.

Stacking and small cages is just down right abuse nothing more than out to make money and lie to potential buyers. My views above would stop inbreeding and safer environment. Thank You for your time. Paula Nance

Thank you for your consideration.

Sincerely,

Paula Nance

Pauline Easley

From: [REDACTED]
Sent: Tuesday, June 07, 2016 4:42 PM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

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Thank you for your consideration.

Sincerely,

Adam Silva

Pauline Easley

From: [REDACTED]
Sent: Tuesday, June 07, 2016 4:37 PM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

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Thank you for your consideration.

Sincerely,

Vin Talwar

Pauline Easley

From: [REDACTED]
Sent: Tuesday, June 07, 2016 4:36 PM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

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Thank you for your consideration.

Sincerely,

Sandra Webber

Pauline Easley

From: [REDACTED]
Sent: Tuesday, June 07, 2016 4:36 PM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

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Thank you for your consideration.

Sincerely,

Mollie Klenzendorf

Pauline Easley

From: [REDACTED]
Sent: Tuesday, June 07, 2016 4:36 PM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

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Thank you for your consideration.

Sincerely,

Jerilyn Ward

Pauline Easley

From: [REDACTED]
Sent: Tuesday, June 07, 2016 4:31 PM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

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Thank you for your consideration.

Sincerely,

Susan Daywood

Pauline Easley

From: [REDACTED]
Sent: Tuesday, June 07, 2016 4:27 PM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

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These souls have feelings, they hurt just like you and I. It is unfathomable that any of us humans could allow any animals to suffer. We have the responsibility to stop unnecessary suffering. Please consider making the changes to improve conditions for them.

Thank you for your consideration.

Sincerely,

Christine Connelly

Pauline Easley

From: [REDACTED]
Sent: Tuesday, June 07, 2016 4:25 PM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

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Thank you for your consideration.

Sincerely,

Pam Tibbs

Pauline Easley

From: [REDACTED]
Sent: Tuesday, June 07, 2016 4:22 PM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

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Thank you for your consideration.

Sincerely,

Sandra Lawing

Pauline Easley

From: [REDACTED]
Sent: Tuesday, June 07, 2016 4:12 PM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

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Many of these dogs will NEVER see sunlight, or have the ability to run around and play like a dog is supposed to. Please do the right thing.

Thank you for your consideration.

Sincerely,

Olivia Gargiulo

Pauline Easley

From: [REDACTED]
Sent: Tuesday, June 07, 2016 4:04 PM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

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Thank you for your consideration.

Sincerely,

Cheryl Goemmer

Pauline Easley

From: [REDACTED]
Sent: Tuesday, June 07, 2016 4:01 PM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

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Thank you for your consideration.

Sincerely,

Katie Scott

Pauline Easley

From: Mary Weaver [REDACTED]
Sent: Tuesday, June 07, 2016 3:58 PM
To: Erule Comments
Subject: dog legislature laws/license fees

I think this is very unnecessary and greedy on the part of Animal Rights' groups. Everyone can see that Texas did not have as many licensed breeders as they were told by the PETA people. They have misled the Texas government and only care about themselves. A lot of people only breed once every 8 years or more, and are lucky to find homes for good quality purebred puppies. I am against this entirely, and will solicit my representatives to that effect. If they have their way, there will be NO cats OR dogs--mutts or purebred!! Please do not fall for their false information and make a fatal decision. Reputable breeders are NOT puppy mill breeders, and DO care who adopts their puppies and or kittens. They screen all applicants to make sure the person who wants the pup/kitten will give it a good, loving home, not use it as a puppy mill animal.

Mary Weaver, animal lover

Pauline Easley

From: [REDACTED]
Sent: Tuesday, June 07, 2016 3:57 PM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

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Thank you for your consideration.

Sincerely,

Jessi Shores

Pauline Easley

From: [REDACTED]
Sent: Tuesday, June 07, 2016 3:55 PM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

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Thank you for your consideration.

Sincerely,

Robin Thomason

Pauline Easley

From: [REDACTED]
Sent: Tuesday, June 07, 2016 3:44 PM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

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Thank you for your consideration.

Sincerely,

Dawn Reed

Pauline Easley

From: [REDACTED]
Sent: Tuesday, June 07, 2016 3:40 PM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

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Thank you for your consideration.

Sincerely,

Krin Asselta

Pauline Easley

From: [REDACTED]
Sent: Tuesday, June 07, 2016 3:36 PM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

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Thank you for your consideration.

Sincerely,

Barbara Lockwood

Pauline Easley

From: [REDACTED]
Sent: Tuesday, June 07, 2016 3:14 PM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

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Thank you for your consideration.

Sincerely,

Gary Lerner

Pauline Easley

From: [REDACTED]
Sent: Tuesday, June 07, 2016 3:12 PM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

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Thank you for your consideration.

Sincerely,

Stephanie Gold

Pauline Easley

From: [REDACTED]
Sent: Tuesday, June 07, 2016 3:10 PM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

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Thank you for your consideration.

Sincerely,

Patrick Pilgrim

Pauline Easley

From: [REDACTED]
Sent: Tuesday, June 07, 2016 3:10 PM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

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Thank you for your consideration.

Sincerely,

Ilyse Niland

Pauline Easley

From: [REDACTED]
Sent: Tuesday, June 07, 2016 3:09 PM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

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All animals deserve good living conditions, which puppy mills often fail to provide. Please help these animals that cannot help or speak for themselves!

Thank you for your consideration.

Sincerely,

Whitney Cloud

Pauline Easley

From: Courtney Moser [REDACTED]
Sent: Tuesday, June 07, 2016 3:07 PM
To: Erule Comments
Subject: TDLR Review of the Standards for the Licensed Commercial Breeders' Act...

To Whom It May Concern,

I am writing today as a Texas citizen who is concerned for the welfare of animals who fall under the scope of the Licensed Commercial Breeder's Act. After reviewing the standards set by the Act, I do not believe they are sufficient to protect the minimum health and safety needs necessary to be considered "humane" treatment. The following revisions should be made in order for the meet the spirit of the original legislation:

1) Animals should be prohibited from being kept in an outdoor facility when the temperature reaches more than 90 degrees or less than 50 degrees.

I can't believe I even have to ask for this. It should go without saying that the animals' basic health and safety would require that they not be exposed to temperatures which could result in heat stroke or cause them such discomfort that they would be unable to sleep due to the cold or heat.

2) Current rules provide an insufficient space for a dog's comfort and barely allows enough room for the animal to turn around. The minimum space should be doubled and TDLR should adopt the increased size recommended by the Advisory Committee when the initial Rules were considered.

It is inhumane to keep any living being crated for long periods of time (in some cases, their entire lives) with just enough room to turn around. These animals are generally not allowed any period of exercise or significant time to stretch outside of their crates. The least we can do is allow them to have sufficient space to spread out as needed.

3) Dogs and cats should not be forced to stand or lie 24/7 on 100% wire or wire mesh for their entire lives. Among other problems, this can result in severe damage to their limbs, paws and is highly unsanitary.

This is a basic health and safety concern as well as an issue of cruel treatment. It is cruel to require an animal to stand and lay on wire or wire mesh for long periods of time. It would be impossible for the animal to ever sit, lay, or stand without pain or discomfort due to the pressure put on the parts of the body touching the mesh. Prolonged standing or laying on wire or wire mesh can result in permanent injury to the animal, and again, in most cases these animals spend the vast majority of their time in the crate. One reason the wire or wire mesh floor is highly unsanitary is that the animals' waste often gets stuck between crates or, since there is currently no prohibition of stacking crates on top of one another, leakage onto another animal or into their already insufficient amount of living space is not uncommon.

4) Stacking of primary dog enclosures on top of one another jeopardizes the health and well-being of the dogs and should not be allowed.

As stated above, stacking allows for the leakage of water, food, medicine, bodily fluid, waste product, etc. from one animal's space to another animal's space which could be multiplied depending on how many crates are stacked on top of each other. For the animal in the top crate: if they accidentally tip their food or water bowl over while attempting to move around in the insufficient amount of space currently set as the requirement, they

will go hungry. For the dog(s) below: it subjects them to being wet or covered in food. But that would be the best case scenario for the dogs below. If instead of food or water, they are on the receiving end of vomit, feces, urine, blood, etc., it could easily cause them to become ill, aside from the sheer discomfort of laying in another animal's waste.

Thank you for your consideration and I sincerely hope that TDLR revises the regulations to better ensure the health, safety, and minimally humane treatment of our animals.

Respectfully,

Courtney Moser

3805 W. Alabama St. Apt. 18

Houston, TX 77098

Pauline Easley

From: Terry Hensley [REDACTED]
Sent: Tuesday, June 07, 2016 2:46 PM
To: Erule Comments
Subject: Help strengthen the rules

Strengthen the rules PLEASE!

- Animals should be prohibited from being kept in an outdoor facility when the temperature reaches more than 90 degrees or less than 50 degrees.
- Current rules provide an insufficient space for a dog's comfort and barely allows enough room for the animal to turn around. The minimum space should be doubled and TDLR should adopt the increased size recommended by the Advisory Committee when the initial Rules were considered.
- Dogs and cats should not be forced to stand or lie 24/7 on 100% wire or wire mesh for their entire lives. Among other problems, this can result in severe damage to their limbs, paws and is highly unsanitary.
- Stacking of primary dog enclosures on top of one another jeopardizes the health and well-being of the dogs and should not be allowed.

The animals have no voice. As God Created humans to watch over and protect HIS creation and creatures, we are doing a poor job and with your help, can do better.

Terry Hensley, Executive Director
Buddy's Animal Rescue
Mason, TX 76856

.

Pauline Easley

From: [REDACTED]
Sent: Tuesday, June 07, 2016 2:38 PM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

In particular, I respectfully urge the Department to propose rules to afford breeding dogs more cage space, require a solid resting surface and ban the unsafe and unsanitary practice of stacking dogs' cages on top of one another. Breeding dogs typically spend their entire lives in these cages so these modest improvements are critical to ensuring a basic standard of wellbeing and safety for them.

Please treat the current practice as an issue of cruelty to these helpless puppies.

Thank you
Velina Ussery

Thank you for your consideration.

Sincerely,

Velina Ussery

Pauline Easley

From: [REDACTED]
Sent: Tuesday, June 07, 2016 2:35 PM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

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Thank you for your consideration.

Sincerely,

Ginga Langford

Pauline Easley

From: [REDACTED]
Sent: Tuesday, June 07, 2016 2:25 PM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

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The business of breeding dogs in mass numbers needs to stop. Strengthen the safety and well-being of the animals that are captive in this. If the business can't or won't do it...close them. Enforcement is vital once standards for Commercial Breeders are strengthened. People need to be able to help the animals.

Thank you for your consideration.

Sincerely,

Peggy Drummond

Pauline Easley

From: [REDACTED]
Sent: Tuesday, June 07, 2016 2:23 PM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

In particular, I respectfully urge the Department to propose rules to afford breeding dogs more cage space, require a solid resting surface and ban the unsafe and unsanitary practice of stacking dogs' cages on top of one another. Breeding dogs typically spend their entire lives in these cages so these modest improvements are critical to ensuring a basic standard of wellbeing and safety for them.

Thank you for your consideration.

Sincerely,

Justine Fourie

Pauline Easley

From: Sussan Martinez [REDACTED]
Sent: Tuesday, June 07, 2016 2:24 PM
To: Erule Comments
Subject: For the animals

Its important that animals are protected from the negligence of people. Therefore the law has to intervene to enforce people to keep an eye on their animals. Here are some of the things we are concerned about.

Animals should be prohibited from being kept in an outdoor facility when the temperature reaches more than 90 degrees or less than 50 degrees. Current rules provide an insufficient space for a dog's comfort and barely allows enough room for the animal to turn around. The minimum space should be doubled and TDLR should adopt the increased size recommended by the Advisory Committee when the initial Rules were considered. Dogs and cats should not be forced to stand or lie 24/7 on 100% wire or wire mesh for their entire lives. Among other problems, this can result in severe damage to their limbs, paws and is highly unsanitary. Stacking of primary dog enclosures on top of one another jeopardizes the health and well-being of the dogs and should not be allowed.

If we fix these small problems will be able to move to greater matters and hopefully one day put an end to animal cruelty in America.

Pauline Easley

From: [REDACTED]
Sent: Tuesday, June 07, 2016 2:21 PM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

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Let These Animals Have A Nice And Roomy Place To Move Around In!
They CANNOT Speak! On Behalf of Them I Am Sending A Message,
Urging To Give These Animals FREEDOM!

Thank you for your consideration.

Sincerely,

Tiffany Gauna

Pauline Easley

From: [REDACTED]
Sent: Tuesday, June 07, 2016 2:16 PM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

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Thank you for your consideration.

Sincerely,

Heidi Andersen

Pauline Easley

From: [REDACTED]
Sent: Tuesday, June 07, 2016 2:07 PM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

In particular, I respectfully urge the Department to propose rules to afford breeding dogs more cage space, require a solid resting surface and ban the unsafe and unsanitary practice of stacking dogs' cages on top of one another. Breeding dogs typically spend their entire lives in these cages so these modest improvements are critical to ensuring a basic standard of wellbeing and safety for them.

Thank you for your consideration.

Sincerely,

tracy kalkwarf

Pauline Easley

From: [REDACTED]
Sent: Tuesday, June 07, 2016 2:00 PM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

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Thank you for your consideration.

Sincerely,

natalie teniente

Pauline Easley

From: [REDACTED]
Sent: Tuesday, June 07, 2016 1:44 PM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

In particular, I respectfully urge the Department to propose rules to afford breeding dogs more cage space, require a solid resting surface and ban the unsafe and unsanitary practice of stacking dogs' cages on top of one another. Breeding dogs typically spend their entire lives in these cages so these modest improvements are critical to ensuring a basic standard of wellbeing and safety for them.

Please change laws to improve the standards for breeders that breed and house puppies and parents in substandard living conditions. Often the breeding parents are caged throughout their lives. Puppies are kept in dirty cages often living in their own feces and urine. Their health is affected, as is the quality of life. The puppy mills are the product of greed and without regard to the animal's comfort or health. Please stop this inhumane practice of breeding dogs in puppy mills.

Thank you for your consideration.

Sincerely,

Cynthia Kalati

Pauline Easley

From: [REDACTED]
Sent: Tuesday, June 07, 2016 1:35 PM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

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I urge you to consider banning the breeding of more than a few dogs at a time, and ban the practice of full time caging of these animals. Dogs are social, companion animals and should not be treated like inanimate objects.

Thank you for your consideration.

Sincerely,

Leslie Currens

Pauline Easley

From: [REDACTED]
Sent: Tuesday, June 07, 2016 1:34 PM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

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Thank you for your consideration.

Sincerely,

Rebecca Hayes

Pauline Easley

From: [REDACTED]
Sent: Tuesday, June 07, 2016 1:25 PM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

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Thank you for your consideration.

Sincerely,

Siobhan Kiernan

Pauline Easley

From: [REDACTED]
Sent: Tuesday, June 07, 2016 1:19 PM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

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Thank you for your consideration.

Sincerely,

Laura Gray

Pauline Easley

From: [REDACTED]
Sent: Tuesday, June 07, 2016 1:18 PM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

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Thank you for your consideration.

Sincerely,

Clea Hawila

Pauline Easley

From: Natalie Lynch [REDACTED]
Sent: Tuesday, June 07, 2016 1:10 PM
To: Erule Comments
Subject: Licensed Breeder Program

I wanted to take the time to thank TDLR for administering the Licensed Breeder program. TDLR has made this new program a success and is on track to make it something Texans can be proud of.

I want to urge TDLR to focus on the quality of this program. This program is now established and, with the mandated amount of attention or more, can become the type of licensing scheme Texans can hold in high regard rather than one that is mimicking poorly drafted federal USDA standards. As Texans, we know we can always and should always do things better than the feds.

Specifically, I hope that the TDLR finds Texas-specific was to address the following:

- Holding required meetings;
- Adjusting size requirements for cage to be appropriate for living beings;
- Drafting rules that address weather and temperature rules;
- Educating the public about this program;
- Appropriately regulate cage stacking; and
- Requiring proper flooring for all cages.

Thanks, again, for all you do. I look forward to being part of this program's robust future.

Kind regards,
Natalie Lynch

Pauline Easley

From: [REDACTED]
Sent: Tuesday, June 07, 2016 1:11 PM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

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Thank you for your consideration.

Sincerely,

Malory Skaugen

Pauline Easley

From: [REDACTED]
Sent: Tuesday, June 07, 2016 1:05 PM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

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Thank you for your consideration.

Sincerely,

Tara Potts

Pauline Easley

From: [REDACTED]
Sent: Tuesday, June 07, 2016 12:53 PM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

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Thank you for your consideration.

Sincerely,

Patricia Bocanegra

Pauline Easley

From: Stacie Flowers [REDACTED]
Sent: Tuesday, June 07, 2016 12:46 PM
To: Erule Comments
Subject: Strengthening Puppy Mill Standards

Good afternoon,

I am sending this email to ask you to please strengthen the following standards to help ensure the animals well-being. These animals depend on us to help keep them safe from bad breeders.

- **Animals should be prohibited from being kept in an outdoor facility when the temperature reaches more than 90 degrees or less than 50 degrees.**
- **Current rules provide an insufficient space for a dog's comfort and barely allows enough room for the animal to turn around. The minimum space should be doubled and TDLR should adopt the increased size recommended by the Advisory Committee when the initial Rules were considered.**
- **Dogs and cats should not be forced to stand or lie 24/7 on 100% wire or wire mesh for their entire lives. Among other problems, this can result in severe damage to their limbs, paws and is highly unsanitary.**
- **Stacking of primary dog enclosures on top of one another jeopardizes the health and well-being of the dogs and should not be allowed.**

Thank you for your consideration.

Stacie Flowers
214-502-7166
Gun Barrel City, TX

Pauline Easley

From: [REDACTED]
Sent: Tuesday, June 07, 2016 12:46 PM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

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Thank you for your consideration.

Sincerely,

Beverly Davis

Pauline Easley

From: Andrea Greig [REDACTED]
Sent: Tuesday, June 07, 2016 12:39 PM
To: Erule Comments
Subject: Please consider

- Animals should be prohibited from being kept in an outdoor facility when the temperature reaches more than 90 degrees or less than 50 degrees.
- Current rules provide an insufficient space for a dog's comfort and barely allows enough room for the animal to turn around. The minimum space should be doubled and TDLR should adopt the increased size recommended by the Advisory Committee when the initial Rules were considered.
- Dogs and cats should not be forced to stand or lie 24/7 on 100% wire or wire mesh for their entire lives. Every dog/cat should be in separate kennels to prevent animals fighting.
- Stacking of primary dog enclosures on top of one another jeopardizes the health and well-being of the dogs and should not be allowed.
- Monitoring of pets sites on Facebook like ATX Pitbull and rehoming, ATX adopt my pet, Hill country pet and rehoming just to name a few. These sites have a huge amount of dog breeders that could be in violation of the Texas license breeders act.
- A tip line where people can call about people breeding dogs and an investigative team that will go to these breeders homes to investigate or even educate people about not breeding dogs.
- **"Dog or cat breeder"** means a person **who possesses 11 or more adult intact female** animals and is engaged in the business of breeding those animals for direct or indirect sale or for exchange in return for consideration and who sells or exchanges, or offers to sell or exchange, **not fewer than 20 animals in a calendar year. This needs to be changed because of the over population in shelters. At least get it down to five adult intact females.**

- We need regulation on back yard breeders who breed dogs for profit and not so much regulation on show breeders.

Thank you,
Officer Andrea Greig
Police Officer/ Animal Cruelty Investigator

Pauline Easley

From: [REDACTED]
Sent: Tuesday, June 07, 2016 12:38 PM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

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Thank you for your consideration.

Sincerely,

John Lewallen

Pauline Easley

From: [REDACTED]
Sent: Tuesday, June 07, 2016 12:30 PM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

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Thank you for your consideration.

Sincerely,

Eric Friedrich

Pauline Easley

From: [REDACTED]
Sent: Tuesday, June 07, 2016 12:27 PM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

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Thank you for your consideration.

Sincerely,

Jordan Ullrich

Pauline Easley

From: [REDACTED]
Sent: Tuesday, June 07, 2016 12:18 PM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

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Thank you for your consideration.

Sincerely,

lori peniche

Pauline Easley

From: [REDACTED]
Sent: Tuesday, June 07, 2016 11:59 AM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

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Just close all puppy mills. They are cruel and the ones that own them are just greedy individuals with no regard to life what so ever.

Thank you for your consideration.

Sincerely,

Rosie Lopez

Pauline Easley

From: [REDACTED]
Sent: Tuesday, June 07, 2016 11:53 AM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

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Thank you for your consideration.

Sincerely,

jessica casares

Pauline Easley

From: [REDACTED]
Sent: Tuesday, June 07, 2016 11:44 AM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

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Thank you for your consideration.

Sincerely,

Laura Orellana

Pauline Easley

From: [REDACTED]
Sent: Tuesday, June 07, 2016 11:42 AM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

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Thank you for your consideration.

Sincerely,

Thomas Fox

Pauline Easley

From: Joe Cates [REDACTED]
Sent: Tuesday, June 07, 2016 11:41 AM
To: Erule Comments
Subject: Licenced Dog & Cat Breeders

To Whom It May Concern,

Let me start by saying that there are many Qualified, Responsible, and Caring Dog and Cat Breeders out there, who truly love and care for their animals and are committed to preserving and improving the animals they are breeding, many of them going way above and beyond any of the standards you have set. This E-mail is not intended for them.

Unfortunately there are also many Breeders who only care about making a quick easy buck and have little or no concern for the animals in their charge and who are completely dependent on them for every need for life. These are the people who need to be monitored very closely. If they are serious Breeders then they should be doing everything they can to insure the happiness and good health of the animals that are providing them with their livelihood. There are shelters full of animals, so there's no reason why Breeders who will not or can't afford to conform to your minimum standards shouldn't be put out of business.

Please consider strengthening your policies to include the following.

- Animals should be prohibited from being kept in an outdoor facility when the temperature reaches more than 90 degrees or less than 50 degrees.
- Current rules provide an insufficient space for a dog's comfort and barely allows enough room for the animal to turn around. The minimum space should be doubled and TDLR should adopt the increased size recommended by the Advisory Committee when the initial Rules were considered.
- Dogs and cats should not be forced to stand or lie 24/7 on 100% wire or wire mesh for their entire lives. Among other problems, this can result in severe damage to their limbs, paws and is highly unsanitary.
- Stacking of primary dog enclosures on top of one another jeopardizes the health and well-being of the dogs and should not be allowed.

If you would like to see an exemplary facility for Dogs and Cats visit the Zoot Pet Hospital & Boarding Suites at 3981 Highway 29 West in Georgetown, Texas. It's probably way above and beyond what your minimum standards should be but you could get some idea of what kennel sizes and conditions should be.

In closing I would just like you to imagine your pet being in one of the facilities you are inspecting. Thanks for listening.

Sincerely Joseph Cates



Virus-free. www.avast.com

Pauline Easley

From: [REDACTED]
Sent: Tuesday, June 07, 2016 11:40 AM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

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Thank you for your consideration.

Sincerely,

Ellen Bunch

Pauline Easley

From: [REDACTED]
Sent: Tuesday, June 07, 2016 11:29 AM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

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Thank you for your consideration.

Sincerely,

Jacqueline Davis

Pauline Easley

From: [REDACTED]
Sent: Tuesday, June 07, 2016 11:24 AM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

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I respectfully request that the rules for breeding be upgraded to provide healthy and larger facilities for these animals. This should include a solid surface for them to rest on, and prohibit the stacking of crates on to of one another! There should be a maximum limit as to how many times an animal can reproduce and additionally how frequently they can be impregnated. Many of these facilities are cruel and abusive and need better regulations put in place!!!!

Thank you for your consideration.

Sincerely,

Jackie Lankton

Pauline Easley

From: [REDACTED]
Sent: Tuesday, June 07, 2016 11:21 AM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

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Thank you for your consideration.

Sincerely,

Angie Hall

Pauline Easley

From: [REDACTED]
Sent: Tuesday, June 07, 2016 11:20 AM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

In particular, I respectfully urge the Department to propose rules to afford breeding dogs more cage space, require a solid resting surface and ban the unsafe and unsanitary practice of stacking dogs' cages on top of one another. Breeding dogs typically spend their entire lives in these cages so these modest improvements are critical to ensuring a basic standard of wellbeing and safety for them.

We aren't asking for much. These are very modest improvements we are asking for. It's the least we should do. Please require these modest improvements as a minimum required standard as enact higher minimum standards if possible.

Thank you for your consideration.

Sincerely,

Renee Nesper

Pauline Easley

From: [REDACTED]
Sent: Tuesday, June 07, 2016 11:19 AM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

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Thank you for your consideration.

Sincerely,

Priscilla Rivera

Pauline Easley

From: [REDACTED]
Sent: Tuesday, June 07, 2016 11:16 AM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

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Thank you for your consideration.

Sincerely,

Kathy Flocco-McMaster

Pauline Easley

From: [REDACTED]
Sent: Tuesday, June 07, 2016 11:11 AM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

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Thank you for your consideration.

Sincerely,

Amie Smith

Pauline Easley

From: [REDACTED]
Sent: Tuesday, June 07, 2016 11:05 AM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

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Thank you for your consideration.

Sincerely,

Jeremiah Long

Pauline Easley

From: [REDACTED]
Sent: Tuesday, June 07, 2016 11:05 AM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

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The Houston area shelters are over-filled with cats and dogs every week. Thousands of shelter animals are put to death every year due to lack of space. Breeding animals is simply unnecessary. It only contributes to more animals at the shelters instead of in pet parents' homes.

Thank you for your consideration.

Sincerely,

Kathleen F. Archer

Pauline Easley

From: [REDACTED]
Sent: Tuesday, June 07, 2016 11:04 AM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

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As the owner of 8 rescue dogs that were dumped after First Monday in Canton Texas, I respectfully request that all consideration be given to limiting the breeders and the deplorable conditions the animals suffer. Many of the animals are sick when sold to the public due to lack of veterinary care. Perhaps the license to breed dogs and cats could have a cost as to ensure only the dedicated breeders were in business.

Thank you for your consideration.

Sincerely,

Darlene Morrison

Pauline Easley

From: [REDACTED]
Sent: Tuesday, June 07, 2016 11:00 AM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

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Thank you for your consideration.

Sincerely,

Lorene Jajtner

Pauline Easley

From: Brooks, Paige [REDACTED]
Sent: Tuesday, June 07, 2016 11:00 AM
To: Erule Comments
Subject: Strict standards on puppy mills

Hello! Please use stricter standards on puppy mills!!

- Animals should be prohibited from being kept in an outdoor facility when the temperature reaches more than 90 degrees or less than 50 degrees.
- Current rules provide an insufficient space for a dog's comfort and barely allows enough room for the animal to turn around. The minimum space should be doubled and TDLR should adopt the increased size recommended by the Advisory Committee when the initial Rules were considered.
- Dogs and cats should not be forced to stand or lie 24/7 on 100% wire or wire mesh for their entire lives. Among other problems, this can result in severe damage to their limbs, paws and is highly unsanitary.
- Stacking of primary dog enclosures on top of one another jeopardizes the health and well-being of the dogs and should not be allowed.

Paige Brooks
Founder of Without Remorse Jewelry - withoutremorse.net
Masters: Entrepreneurship
[REDACTED]
918-815-2528

Pauline Easley

From: [REDACTED]
Sent: Tuesday, June 07, 2016 10:58 AM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

In particular, I respectfully urge the Department to propose rules to afford breeding dogs more cage space, require a solid resting surface and ban the unsafe and unsanitary practice of stacking dogs' cages on top of one another. Breeding dogs typically spend their entire lives in these cages so these modest improvements are critical to ensuring a basic standard of wellbeing and safety for them.

It is unthinkable that breeders are allowed to treat animals so callously, caring only about profit and not about how inhumanely they are being.

I recently moved from Grapevine and recall two or three instances where puppy mill dogs were "dumped" in the middle of the night. It was heartbreaking. Please prevent that from happening by limiting the number of animals breeders are allowed to own!!

Thank you for your consideration.

Sincerely,

Diane Goodwin

Pauline Easley

From: [REDACTED]
Sent: Tuesday, June 07, 2016 10:58 AM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

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Thank you for your consideration.

Sincerely,

Linda Pickthall

Pauline Easley

From: [REDACTED]
Sent: Tuesday, June 07, 2016 10:57 AM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

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Thank you for your consideration.

Sincerely,

Judy Wade

Pauline Easley

From: [REDACTED]
Sent: Tuesday, June 07, 2016 10:32 AM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

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Thank you for your consideration.

Sincerely,

Jim Long

Pauline Easley

From: [REDACTED]
Sent: Tuesday, June 07, 2016 10:18 AM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

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Thank you for your consideration.

Sincerely,

James Douthit

Pauline Easley

From: Monica Drake [REDACTED]
Sent: Tuesday, June 07, 2016 10:22 AM
To: Erule Comments
Subject: Licensed Breeders Rules

To the Texas Department of Licensing and Regulation:

I would like to offer my comment on proposed rules for licensed breeders in the state of Texas. As a member of a non-profit group involved in animal welfare, I feel strongly that Texas should lead the way and be an example to other states in terms of tough standards on breeders. If these standards can be issued and enforced, they will not only aide the welfare of the domestic animal population but may enable tougher restrictions on backyard breeders and illegal puppy mills. Please consider the following issues:

- Animals should be prohibited from being kept in an outdoor facility when the temperature reaches more than 90 degrees or less than 50 degrees.
- Current rules provide an insufficient space for a dog's comfort and barely allows enough room for the animal to turn around. The minimum space should be doubled and TDLR should adopt the increased size recommended by the Advisory Committee when the initial Rules were considered.
- Dogs and cats should not be forced to stand or lie 24/7 on 100% wire or wire mesh for their entire lives. Among other problems, this can result in severe damage to their limbs, paws and is highly unsanitary.
- Stacking of primary dog enclosures on top of one another jeopardizes the health and well-being of the dogs and should not be allowed.

Best Regards,

Monica M. Drake

1209 S West Street, Arlington, Texas 76010 817-709-9251

Pauline Easley

From: [REDACTED]
Sent: Tuesday, June 07, 2016 10:09 AM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

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Just because they cannot speak doesn't mean they don't have feelings! Stop treating them as if they are dumb animals. They have personalities and spirits that need love only. If you must breed, do it humanely.

Thank you for your consideration.

Sincerely,

Lisa Garcia

Pauline Easley

From: [REDACTED]
Sent: Tuesday, June 07, 2016 10:10 AM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

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Thank you for your consideration.

Sincerely,

Audrey Vertucci

Pauline Easley

From: [REDACTED]
Sent: Tuesday, June 07, 2016 10:14 AM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

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My dogs are my family. I could not imagine having a member of my family living in an undesirable home. I am one person, but I believe that the voice of one can speak volumes. These animals have no voice. We have to be their voice. So on behalf of them, PLEASE help ! If there is something that can be done to help them, then PLEASE help them. Thank you so much on behalf of myself and my family, Tom, Skyler, Parker🐶, Apollo 🐶, Bruno 🐶 And Beatrice 🐶

Thank you for your consideration.

Sincerely,

Sabrina Szarek

Pauline Easley

From: Drusilla Williams [REDACTED]
Sent: Tuesday, June 07, 2016 10:12 AM
To: Erule Comments
Subject: pet licensing

i think current law to abolish pet licensing law is a good tone. no way will this be able to suport this law. to abopish pets is rediculous.lw

Pauline Easley

From: [REDACTED]
Sent: Tuesday, June 07, 2016 10:07 AM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

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This practice is cruelty of unspeakable horrors. It must be stopped.

Thank you for your consideration.

Sincerely,

Phyllis Ball

Pauline Easley

From: [REDACTED]
Sent: Tuesday, June 07, 2016 10:03 AM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

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The simple request to provide these minimally basic acts of kindness are necessary to acknowledge one's sense of humaneness. To do nothing is an act of disregard for life. A stroke of your pen makes the difference and speaks volumes to all who care and the lives of the helpless that you can't hear. Please hear their cries by listening to your heart.

Sincerely, Patricia Fontanot

Thank you for your consideration.

Sincerely,

Patricia Fontanot

Pauline Easley

From: [REDACTED]
Sent: Tuesday, June 07, 2016 10:02 AM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

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Thank you for your consideration.

Sincerely,

Dwayne Dassing

Pauline Easley

From: [REDACTED]
Sent: Tuesday, June 07, 2016 10:02 AM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

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This is legal animal cruelty. Would not this be "confining an animal in a cruel manner, according to the state of Texas?" As of yet, there are not breeding regulations in Texas, however, the state has animal cruelty laws. I strongly encourage TDLR to enforce breeding regulations for the welfare of these animals.

Thank you for your consideration.

Sincerely,

Theresa Javorsky

Pauline Easley

From: [REDACTED]
Sent: Tuesday, June 07, 2016 10:00 AM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

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Thank you for your consideration.

Sincerely,

Maria Alvarez

Pauline Easley

From: [REDACTED]
Sent: Tuesday, June 07, 2016 9:55 AM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

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Thank you for your consideration.

Sincerely,

Jane Long

Pauline Easley

From: [REDACTED]
Sent: Tuesday, June 07, 2016 9:51 AM
To: Erule Comments
Subject: Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

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Thank you for your consideration.

Sincerely,

Donna Pebworth