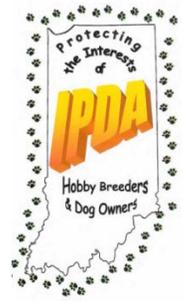


Indiana Purebred Dog Alliance, Inc.
P.O. Box 503066
Indianapolis, IN 46250



June 14, 2012

Subject: Proposed USDA/APHIS Regulation Changes

The Indiana Purebred Dog Alliance, Inc. is an AKC Federation Club. Our members are AKC affiliated Kennel Clubs and responsible hobby breeders of AKC registered dogs throughout the state of Indiana. We are opposed to the proposed USDA/APHIS regulation changes. The following are comments and concerns we have regarding the proposed regulation changes.

The definition of "breeding female" is unclear. What age constitutes a "breeding female?"

How does Indiana law work with this proposed rule? Our law states that having fewer than 20 unaltered females constitutes a hobby breeder. Commercial breeders are defined as those who have 20 or more unaltered females. The proposed USDA/APHIS regulation says 4 breeding females constitute a hobby breeder. That's a big difference. Which rule or law takes precedence? States have the right to pass their own laws and citizens of that state are to abide by them. Why is federal government intervention necessary?

All responsible hobby breeders sell on contracts that state a reasonable time to return a puppy/dog to the breeder if the veterinary check is unsatisfactory. Why not include the contract as a matter of course in the proposed rule rather than licensing?

Reputable hobby breeders buy and sell puppies and dogs from other reputable breeders without actually seeing the dog or puppy in person. We know who the reputable breeders are.

What about repeat buyers who want another puppy from a hobby breeder because there is an element of trust established from a prior purchase?

Long distances can make it difficult to actually see a puppy or dog. When the element of trust is there, why make the hobby breeder get a license when the dogs and puppies they sell are well-bred and in good health?

Conditions for large commercial operations are entirely different than for hobby breeders. Our dogs and puppies are born in our homes and we give them tender, loving care. They are not in a separate building, in wire cages and let out in kennel runs.

How will these new rules be administered? Why regulate those of us who are doing an equal if not better job at raising dogs and puppies than the commercial breeders?

If your goal is to eliminate hobby breeders, these proposed regulation changes will certainly help do that. We breed the best dogs and do our best to abide by the AKC standard for the breeds we love. Eliminating our breeding programs will only give the general public the choice of buying a pet from commercial kennels or pet stores. Is that what the USDA/APHIS really wants?

Hobby breeders are not in the business of breeding dogs for money. We breed for the love of the sport of purebred dogs. We scrutinize our buyers to find the best homes for our puppies and dogs. We require personal references and veterinary references. Commercial breeders and pet stores do not. We sell all of our dogs and puppies on contracts with an overall health guarantee for at least the first 72 hours and then 2-5 years on genetic diseases. Commercial breeders and pet stores do not provide such a guarantee. We stipulate that if for any reason the buyer of the dog or puppy cannot keep it, we will take it back. Commercial breeders and pet stores do not make this stipulation.

We hope that you will seriously consider the above comments and concerns and reconsider instituting the proposed regulations on hobby breeders.

Sincerely,

Carole Creech, President
Indiana Purebred Dog Alliance, Inc.