

June 17, 2016

The Honorable Eileen Heaphy, Chair City of Stamford Board of Representatives Legislative and Rules Committee 888 Washington Blvd. Stamford, CT 06904-2152

RE: AKC Opposes Breeder Permits in LR29052

Dear President Skigen and members of Stamford's Board of Representatives:

The American Kennel Club (AKC) writes again on behalf of many dog owners in Stamford regarding concerns with the current draft of proposed changes to the City's Public Safety and Animal Welfare Ordinance. We remain concerned with requiring breeding limits and breeding permits.

<u>The American Kennel Club opposes the concept of breeding permits, as proposed in Sec. 111-12.</u> Breeding permits have been found extremely difficult to enforce. They penalize law abiding citizens while creating an incentive for others to avoid licensing, vaccination and regular veterinary care, ultimately creating a greater public health hazard.

Sec. 111-12 (subsection A(3)) also requires that the breeding permit be applied for before the gestation period of any female dog. A common understanding of the term "gestation period" is the time in which a fetus develops, beginning with fertilization and ending at birth. This current wording, therefore, does not provide a means by which an unintentional contravention of the draft permit process (i.e., an unplanned litter) can be remedied. Absent additional compliance processes (i.e., allowing for permit acquisition after conception but prior to birth), the current wording is likely to further reduce compliance rates.

Additionally, we believe that the best course of care for any dog is determined by its owner under the advisement of the dog's veterinarian. We remain steadfastly concerned with government-directed animal husbandry limits in any circumstances.

For these reasons, we respectfully oppose Sec. 111-12 in its entirety and urge its removal prior to passage.

The American Kennel Club appreciates your time and consideration of our concerns, and we respectfully urge you to incorporate these recommended changes into the proposed ordinance changes prior to adoption. The AKC, together with the Connecticut Dog Federation, local AKC dog clubs and your constituent responsible dog owners respectfully urge you and your fellow members of the Stamford Board of Representatives to address these concerns. Please do not hesitate to contact us for assistance at 919-816-3720.

Sincerely,

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Sheila Goffe, Vice President AKC Government Relations

CC: Stamford Board of Representatives Andrew Kalmanash