

THE ANIMAL COUNCIL

P.O. Box 168, Millbrae CA 94030

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June 19, 2012

Via Facsimile 916-324-0917

The Honorable Curran Price, Chair
The Honorable Bill Emmerson, Vice-Chair
Senate Committee on Business, Professions & Economic Development
State Capitol, Room 2053
Sacramento CA 95814
Attention: Bill Consultant

Re: Dog licensing: issuance: puppy licenses, as amended April 16, 2012, OPPOSE

Dear Chairman Price and Members:

Please register our opposition to the above-captioned bill and include our organization on your Committee's Bill Analysis opposition list with our apology for the late date of this letter.

While we think that this bill has been pared down from its original statewide mandate, nevertheless we believe that the transfer reporting requirements are too difficult for the many of the people – individuals, groups and organizations that would be required to file these monthly reports. The “rescue group” definition originated in 1998 with the Vincent bill, AB 1856 and is the broadest definition including as few as 2 people working informally to rescue dogs from shelters. This also includes rescue work done by volunteer members of small dog breed clubs as incidental to the clubs' core functions. These kinds of hands-on-volunteers have no support staff and come and go from rescue and placement work. To expect or require them to file monthly reports is unrealistic, especially when failure to comply is not just a status issue as results from not filing timely organization documents with the Secretary of State, Registry of Charitable Trusts, Franchise Tax Board or IRS but actual civil fines. Likewise, most individual dog breeders who would be at times covered by Health & Safety Code Section 122045 are not operating a commercial business on a regular basis but hit the low threshold sometime in a 12-month period and are often unaware of even basic statewide, compliance requirements. They would be at high risk for simply not knowing the reporting requirement, let alone filing at the proper 30-day intervals when required. Accordingly, we oppose AB 1939.

THE ANIMAL COUNCIL (TAC) is a California nonprofit, public benefit corporation founded in 1991 to seek positive, humane solutions to the challenges of detrimental animal public policies, legislation and regulation through study, analysis and application of animal husbandry, statistics and law, and at the same time preserve human benefit from all species, breeds and registries.

Very truly yours,



SHARON A. COLEMAN
President, The Animal Council

Cc Author
Committee Members