

Regulatory Analysis Form

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IRRC REGULATORY
REVIEW COMMISSION

(1) Agency
Department of State, Bureau of Professional and Occupational Affairs, State Registration Board for Professional Engineers, Land Surveyors and Geologists

(2) I.D. Number (Governor's Office Use)
16A-478

IRRC Number: **2453**

(3) Short Title
Biennial Renewal Fees / Examination Fees

(4) PA Code Cite
49 Pa. Code §37.17

(5) Agency Contacts & Telephone Numbers

Primary Contact: **Steven Wennberg, Board Counsel
783-7200**

Secondary Contact: **Joyce McKeever, Deputy Chief
Counsel, 783-7200**

(6) Type of Rulemaking (check one)
 Proposed Rulemaking
 Final Order Adopting Regulation
 Final Order, Proposed Rulemaking
 Omitted

(7) Is a 120-Day Emergency Certification Attached?

No
 Yes: By the Attorney General
 Yes: By the Governor

(8) Briefly explain the regulation in clear and nontechnical language.

The regulation raises the biennial renewal fees for professional engineers, professional land surveyors and professional geologists from \$25 to \$50 and deletes the schedule of examination fees for all three licensure classes. The regulation also makes editorial changes.

(9) State the statutory authority for the regulation and any relevant state or federal court decisions.

Section 9 of the Engineer, Land Surveyor and Geologist Registration Law (Registration Law), 63 P.S. §156, authorizes the Board to establish fees as are necessary to generate sufficient revenues for the Board's operations. Section 4(e) of the Registration Law (63 P.S. §151(e)) contemplates that the Board may assess biennial renewal fees by regulation.

Regulatory Analysis Form

(10) Is the regulation mandated by any federal or state law or court order, or federal regulation? If yes, cite the specific law, case or regulation, and any deadlines for action.

Section 9 of the Registration Law mandates that the Board establish fees by regulation.

(11) Explain the compelling public interest that justifies the regulation. What is the problem it addresses?

Section 9 of the Registration Law requires the Board to generate adequate revenues through fees to meet its expenses over a biennial period. Biennial renewal fees account for approximately 77% of the Board's biennial revenues from fees. Biennial renewal revenues defray general operating expenses and overhead that cannot be apportioned to specific segments of the regulated community. The current biennial renewal fees are inadequate to meet the Board's revenue requirements. According to the Department of State's Bureau of Finance and Operations (BFO), the Board will incur large deficits over the next several fiscal years -- resulting in a cumulative deficit of approximately \$652,640 by the end of FY06-07 -- unless the new biennial renewal fees are adopted. The new biennial renewal fees will allow the Board to enjoy positive revenue balances for the foreseeable future.

Deletion of the examination fees furthers the goal of Governor's Executive Order 1996-1 (relating to regulatory review and promulgation) by eliminating unnecessary regulations. The examination fees are not appropriate for regulations because they are established by contract between the Commonwealth and the independent testing organizations that develop, administer and grade the Board's examinations.

(12) State the public health, safety, environmental or general welfare risks associated with nonregulation.

The principal risk associated with nonregulation is that a significant portion of the Board's expenses would be subsidized by revenues from other licensing boards within the Bureau of Professional and Occupational Affairs, thereby frustrating the legislative requirement that each licensing board achieve fiscal self-sufficiency through the support of its regulated community.

(13) Describe who will benefit from the regulation. (Quantify the benefits as completely as possible and approximate the number of people who will benefit.)

The regulation benefits the Board's regulated community and the public at large by ensuring that the Board has adequate revenues to discharge its duties under the Registration Law.

Regulatory Analysis Form

(14) Describe who will be adversely affected by the regulation. (Quantify the adverse effects as completely as possible and approximate the number of people who will be adversely affected.)

The Board cannot identify any group that will be adversely affected by the regulation.

(15) List the persons, groups or entities that will be required to comply with the regulation. (Approximate the number of people who will be required to comply.)

Professional engineers, professional land surveyors and professional geologists will be required to pay the new biennial renewal fees. The Board estimates that approximately 32,355 professional engineers, 3,413 professional land surveyors and 2,637 professional geologists will renew their registrations for the biennial renewal period that begins October 1, 2005.

(16) Describe the communications with and input from the public in the development and drafting of the regulation. List the persons and/or groups who were involved, if applicable.

Because the need for the regulation is based on a fiscal analysis conducted by the BFO using a standardized methodology, the Board did not believe that input from the public or the regulated community at the drafting stage of the regulation would have been helpful in the drafting of proposed rulemaking.

(17) Provide a specific estimate of the costs and/or savings to the regulated community associated with compliance, including any legal, accounting or consulting procedures which may be required.

The Board estimates that approximately 38,405 licensees will pay the new biennial renewal fees established by the regulation. The Board estimates that the total additional cost to the regulated community during each biennial renewal period will be approximately \$960,125.

The regulation will not impose new legal, accounting or consulting procedures.

Regulatory Analysis Form

(18) Provide a specific estimate of the costs and/or savings to local governments associated with compliance, including any legal, accounting or consulting procedures which may be required.

The regulation will not result in costs or savings to local government.

(19) Provide a specific estimate of the costs and/or savings to state government associated with the implementation of the regulation, including any legal, accounting, or consulting procedures that may be required.

The regulation will not result in costs or savings to state government. However, the Board estimates that the regulation will generate approximately \$960,125 in additional revenues during each biennial renewal period.

Regulatory Analysis Form

(20) In the table below, provide an estimate of the fiscal savings and costs associated with implementation and compliance for the regulated community, local government, and state government for the current year and five subsequent years.

	Current FY	FY +1	FY +2	FY +3	FY +4	FY +5
SAVINGS:	None	None	None	None	None	None
Regulated						
Local Government						
State Government						
Total Savings						
COSTS:						
Regulated	None	\$960.125	None	\$960.125	None	\$960.125
Local Government						
State Government						
Total Costs						
REVENUE LOSSES:	None	None	None	None	None	None
Regulated						
Local Government						
State Government						
Total Revenue Losses						

(20a) Explain how the cost estimates listed above were derived.

The cost estimates in Item 20 are based on the estimated number of renewing licensees during each biennial renewal period multiplied by the additional cost to the licensees:

<u>License Category</u>	<u>Number of Licensees</u>		<u>Additional Cost</u>		
a) Professional Engineer	32,355	x	\$25	=	\$808,875
b) Professional Land Surveyor	3,413	x	\$25	=	\$ 85,325
c) Professional Geologist	2,637	x	\$25	=	\$ 65,925
				Total:	\$960,125

Regulatory Analysis Form

(20b) Provide the past three year expenditure history for programs affected by the regulation.

Program	FY -3	FY -2	FY -1	Current FY
Engineer Board	\$822,000	\$884,000	\$826,000	\$781,000 (est.)

(21) Using the cost-benefit information provided above, explain how the benefits of the regulation outweigh the adverse effects and costs.

The regulation ensures that the Board fulfills its statutory mandate to raise sufficient revenues in each biennial period to offset its expenses for that period.

(22) Describe the nonregulatory alternatives considered and the costs associated with those alternatives. Provide the reasons for their dismissal.

The Board did not consider a nonregulatory alternative. The Registration Law requires the Board to establish fees by regulation.

(23) Describe alternative regulatory schemes considered and the costs associated with those schemes. Provide the reasons for their dismissal.

The Board did not consider any biennial renewal fee other than the \$50 fee recommended by the BFO.

Regulatory Analysis Form

(24) Are there any provisions that are more stringent than federal standards? If yes, identify the specific provisions and the compelling Pennsylvania interest that demands stronger regulation.

There are no federal standards applicable to fees charged by the Board.

(25) How does this regulation compare with those of other states? Will the regulation put Pennsylvania at a competitive disadvantage with other states?

The new biennial renewal fees compare favorably with fees that regulatory boards of neighboring states charge to professional engineers, professional land surveyors and professional geologists for renewal of licensure or registration. A list of the renewal fees charged by the regulatory boards of neighboring states is attached as Exhibit 1.

The regulation will not have any adverse impact on Pennsylvania's competitiveness with other states.

(26) Will the regulation affect existing or proposed regulations of the promulgating agency or other state agencies? If yes, explain and provide specific citations.

The regulation will not affect other existing or proposed regulations of the Board or of any other state agency.

(27) Will any public hearings or informational meetings be scheduled? Please provide the dates, times, and locations, if available.

The Board has not scheduled public hearings or informational meetings in connection with this proposed rulemaking. However, the Board has invited the major trade organizations representing licensees to submit comments following publication of the notice of proposed rulemaking.

Regulatory Analysis Form

(28) Will the regulation change existing reporting, record keeping, or other paperwork requirements? Describe the changes and attach copies of forms or reports that will be required as a result of implementation, if available.

The regulation will require the Board to revise its biennial renewal form to reflect the new biennial renewal fees. The regulation will not change existing reporting, recordkeeping or other paperwork requirements.

(29) Please list any special provisions which have been developed to meet the particular needs of affected groups or persons including, but not limited to, minorities, elderly, small businesses, and farmers.

The regulation will apply uniformly to all licensees who renew their registrations. The Board does not have authority to waive payment of a biennial renewal fee.

(30) What is the anticipated effective date of the regulation; the date by which compliance with the regulation will be required; and the date by which any required permits, licenses or other approvals must be obtained?

The regulation will take effect upon final publication in the Pennsylvania Bulletin, and will apply to the biennial renewal period that begins October 1, 2005.

(31) Provide the schedule for continual review of the regulation.

The Board reviews its revenues and program costs on a fiscal year and biennial basis.

**FEEES CHARGED BY REGULATORY BOARDS OF
NEIGHBORING STATES FOR RENEWAL OF LICENSE OR
REGISTRATION OF PROFESSIONAL ENGINEER, PROFESSIONAL
LAND SURVEYOR, AND PROFESSIONAL GEOLOGIST**

DELAWARE

Professional Engineer (2-year renewal term)	\$50
Professional Land Surveyor (2-year renewal term)	\$17-100*
Professional Geologist (2-year renewal term)	\$11-54*

NEW YORK:

Professional Engineer (3-year renewal term):	\$210
Professional Land Surveyor (3-year renewal term):	\$210

NEW JERSEY:

Professional Engineer (2-year renewal term):	\$80
Professional Land Surveyor (2-year renewal term):	\$80

OHIO:

Professional Engineer (1-year renewal term):	\$16
Professional Land Surveyor (1-year renewal term):	\$16

MARYLAND:

Professional Engineer (2-year renewal term):	\$78
Professional Land Surveyor (2-year renewal term):	\$78

WEST VIRGINIA:

Professional Engineer (1-year renewal term):	\$40
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* Represents pro-rated fee for initial biennial renewal requirement.

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REVIEW COMMISSION

FACE SHEET
FOR FILING DOCUMENTS
WITH THE LEGISLATIVE REFERENCE BUREAU

(Pursuant to Commonwealth Documents Law)

#2453

DO NOT WRITE IN THIS SPACE

Copy below is hereby approved as to form and legality. Attorney General

Copy below is hereby certified to be a true and correct copy of a document issued, prescribed or promulgated by:

Copy below is approved as to form and legality. Executive or Independent Agencies.

BY Amy M. Elliott
(DEPUTY ATTORNEY GENERAL)

State Registration Board for Professional Engineers, Land Surveyors and Geologists

(AGENCY)

[Signature]

DOCUMENT/FISCAL NOTE NO. 16A-478

NOV 04 2004

DATE OF APPROVAL

DATE OF ADOPTION:

10.20.04

DATE OF APPROVAL

BY: [Signature]

EXECUTIVE
(Deputy General Counsel
(~~Chief-Counsel,~~
~~Independent Agency.~~
(Strike inapplicable title)

President

TITLE: (EXECUTIVE OFFICER, CHAIRMAN OR SECRETARY)

[] Check if applicable
Copy not approved.
Objections attached.

[] Check if applicable. No Attorney General approval or objection within 30 days after submission.

PROPOSED RULEMAKING

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF STATE
BUREAU OF PROFESSIONAL AND OCCUPATIONAL AFFAIRS
STATE REGISTRATION BOARD FOR PROFESSIONAL ENGINEERS,
LAND SURVEYORS AND GEOLOGISTS
(49 PA. CODE, CHAPTER 37)

BIENNIAL RENEWAL FEES AND EXAMINATION FEES

PREAMBLE

The State Registration Board for Professional Engineers, Land Surveyors and Geologists (Board) proposes to amend §37.17 (relating to fees) to read as set forth in Annex A.

Description of Proposed Amendments

Section 37.17 sets forth a schedule of fees charged by the Board. The proposed amendments would raise the biennial renewal fees for professional engineers, professional land surveyors and professional geologists from \$25 to \$50; delete the examination fees for all three license classes; and make minor editorial changes.

Background and Need for Proposed Amendments

a. New Biennial Renewal Fees

Section 9 of the Engineer, Land Surveyor and Geologist Registration Law (Registration Law) (63 P.S. §156) provides that the Board's biennial revenues from fees, fines and civil penalties shall meet or exceed the Board's biennial expenditures. Because fines and civil penalties have historically accounted for a small percentage of the Board's total revenues, the Board must generate most of its revenues from fees.

The Board's principal sources of fee revenues are the fees charged to licensees for biennial renewal of their registrations. The biennial renewal fees account for approximately 77% of the Board's fee revenues during each biennial renewal period. The biennial renewal fees defray general operating expenses and overhead -- primarily in the areas of investigation, prosecution and enforcement -- that are not susceptible of being apportioned to a specific segment of persons and entities regulated by the Board and, therefore, are borne equally by the entire regulated community.

The current \$25 biennial renewal fees for professional engineers and professional land surveyors were established in 1978 by the Bureau of Professional and Occupational Affairs Fee Act (63 P.S. §1401-101). The current \$25 biennial renewal fee for professional geologists was adopted in 1994.

A recent analysis prepared by the Department of State's Bureau of Finance and Operations (BFO) determined that the Board's current biennial renewal fee structure is inadequate to meet the Board's revenue needs. As reflected by the following revenue and expense data and projections provided by the BFO, the Board will continue to run large deficits unless the biennial renewal fees are increased:

**Proposed Rulemaking
Biennial Renewal Fees / Examination Fees (#16A-478)
Submitted for Publication on December 22, 2004**

Financial Status	FY02-03	FY03-04	FY04-05	FY05-06	FY06-07
Beginning Balance:	\$239,400.75	(\$482,638.94)	(\$109,531.91)	(\$270,639.68)	\$30,360.32
Revenue:	\$161,960.31	\$1,199,107.03	\$145,000.00	\$1,105,000.00	\$145,000.00
Prior Yr. Returned Funds:	0	0	\$474,892.23	0	0
Total Revenue:	\$401,361.06	\$716,468.09	\$510,360.32	\$834,360.32	\$175,360.32
Adjust. For Prior Year Expenses:	0	0	0	0	0
Expenses:	\$884,000.00	\$826,000.00	\$781,000.00	\$804,000.00	\$828,000.00
Remaining Balance:	(\$482,638.94)	(\$109,531.91)	(\$270,639.68)	\$30,362.32	(\$652,639.68)

To close the gap between the Board's revenues and expenses, the BFO recommended that the Board increase the biennial renewal fees for all three licensure classes from \$25 to \$50, effective with the biennial renewal period that begins October 1, 2005. The higher biennial renewal fees would raise biennial renewal revenues from the current to \$960,125.00 to \$1,920,250.00. The BFO estimates that these additional biennial revenues would enable the Board to have positive balances for the foreseeable future, including approximately \$815,861.32 at the end of FY08-09.

b. Deletion of Examination Fees

The examinations for certification as an engineer-in-training and surveyor-in-training and for licensure as a professional engineer, professional land surveyor, and professional geologist are developed, administered and graded by independent testing organizations under contract with the Commonwealth. The Board has no role in establishing examination fees. Examination fees are established by contract between the independent testing organizations and the Commonwealth and are remitted by examination candidates directly to those organizations. The Board proposes to discontinue the practice of periodically amending its regulations to publish updated schedules of examination fees. Accordingly, the proposed amendments would delete all references to examination fees. The Board would continue to provide current examination fee information to examination candidates on its website.

c. Editorial Changes

The proposed amendments would make minor editorial changes to descriptions of the fees for consistency of usage in the fee schedule.

Fiscal Impact

The proposed amendments would generate approximately \$960,125.00 in additional biennial renewal fee revenues, broken down as follows:

Certification Class	No. of Renewing Licensees	Fee Increase		Additional Revenues
Professional Engineer	32,355	x	\$25	\$808,875.00
Professional Land Surveyor	3,413	x	\$25	\$85,325.00
Professional Geologist	2,637	x	\$25	\$65,925.00

Paperwork Requirements

The proposed amendments would require the Board to change its biennial renewal form to reflect the new fees. The proposed amendments would not create additional paperwork requirements for the regulated community.

Effective Date

The proposed amendments would become effective upon publication of the final regulation in the *Pennsylvania Bulletin*. The new biennial renewal fees would apply to licensees who renew their registrations for the biennial renewal period beginning October 1, 2005.

Statutory Authority

Section 9 of the Registration Law requires the Board to establish fees by regulation and to ensure that revenues derived from fees, fines and civil penalties are adequate to cover the Board's expenditures over a biennial period. Section 4(e) of the Registration Law (63 P.S. §151(e)) contemplates that the Board may assess biennial renewal fees by regulation.

Compliance with Executive Order 1996-1

In accordance with Executive Order 1996-1 (relating to regulatory review and promulgation), the Board, in drafting and promulgating the proposed amendments, attempted to balance its statutory obligation to generate adequate revenues to support its operations against the objective to minimize the fiscal impact on the regulated community. The Board considers the proposed amendments to be both required by law and the least restrictive means of covering the cost of activities that the Board is required to perform.

Regulatory Review

On December 22, 2004, under authority of Section 5(a) and (f) of the Regulatory Review Act (RRA) (71 P.S. §745.5(a) and (f)), the Board submitted copies of this proposed rulemaking, a Regulatory Analysis Form and a Fee Report Form to the Independent Regulatory Review Commission (IRRC). Copies of the Regulatory Analysis and Fee Report Forms are available to the public upon request.

In accordance with Section 5(a) and (f) of the RRA, the Board will deliver copies of this proposed rulemaking and the Regulatory Analysis and Fee Report Forms to the chairpersons of the Senate Standing Committee on Consumer Protection and Professional Licensure and the House Standing Committee on Professional Licensure by the second Monday after the date on which committee designations for the 2005-2006 session of the General Assembly are published in the *Pennsylvania Bulletin*.

Under Section 5(g) of the RRA (71 P.S. §745.5(g)), IRRC may convey comments, recommendations or objections to the proposed amendments within 30 days after the close of the public comment period, specifying the regulatory review criteria that have not been met. The RRA sets forth procedures that permit the Board, the General Assembly and the Governor to review IRRC's comments, recommendations or objections prior to final adoption of the proposed amendments.

Public Comment

The Board invites interested persons to submit written comments, suggestions or objections regarding the proposed amendments to Steven Wennberg, Counsel, State Registration Board for Professional Engineers, Land Surveyors and Geologists, P. O. Box 2649, Harrisburg, PA 17105-2649 within 30 days following publication of this notice of proposed rulemaking in the *Pennsylvania Bulletin*.

ANNEX A

**TITLE 49. PROFESSIONAL AND VOCATIONAL STANDARDS
PART I. DEPARTMENT OF STATE
SUBPART A. PROFESSIONAL AND OCCUPATIONAL AFFAIRS
CHAPTER 37. STATE REGISTRATION BOARD FOR PROFESSIONAL
ENGINEERS, LAND SURVEYORS AND GEOLOGISTS**

* * *

QUALIFICATIONS FOR LICENSURE

* * *

§37.17. Schedule of fees.

(a) *Professional engineers and professional land surveyors.* The Board will charge the following fees:

[Examination for licensure as a professional engineer.....	\$105
October 1998 examination and thereafter.....	\$120
Professional Engineer Exam Review (Optional).....	\$75
Examination for licensure as a professional land surveyor.....	\$187
October 1998-April 1999 examination.....	\$227
October 1999 examination and thereafter.....	\$252
Pennsylvania Fundamentals of Land Surveying Portion.....	\$42
N.C.E.E.S. Fundamentals of Land Surveying Portion.....	\$40
October 1998 examination and thereafter.....	\$65
N.C.E.E.S. Principles and Practices of Land Surveying.....	\$60

**Proposed Rulemaking
Biennial Renewal Fees /Examination Fees (#16A-478)
Submitted for Publication on December 22, 2004**

October 1998-April 1999 examination.....	\$75
October 1999 examination and thereafter.....	\$100
Administration (to be added to total parts taken at one sitting).....	\$45
Examination for certification as engineer-in-training.....	\$75]
<u>Biennial renewal of registration.....</u>	<u>\$50</u>

(b) *Professional geologists.* The Board will charge the following fees:

Application for registration.....	\$50
Biennial renewal <u>of registration</u> [fee].....	[\$25] \$50
Temporary permit [fee].....	\$25
[Fundamentals of Geology Examination.....	\$150
Principles/Practices of Geology Examination.....	\$150
Examination Access Fee (to be added to each examination taken).....	\$25
Administration (to be added to total parts taken at one sitting).....	\$45]

(c) *Other fees.* The Board will charge the following fees:

Certification of license, registration, permit or scores.....	\$25
Verification of license, registration or permit.....	\$15

FEE REPORT FORM

Agency: State - BPOA

Date: 9/15/04

Contact: Basil L. Merenda, Commissioner
Bureau of Professional and Occupational Affairs

Phone No. 783-7192

Fee Title, Rate and Estimated Collections:

Professional Engineer Biennial Renewal Fee: \$50.00
Professional Land Surveyor Biennial Renewal Fee: \$50.00
Professional Geologist Biennial Renewal Fee: \$50.00

Estimated Biennial Revenue:

Engineer - \$1,617,750.00 (32,355 x \$50.00)
Land Surveyor - \$170,650.00 (3,413 x \$50.00)
Geologist - \$131,850.00 (2,637 x \$50.00)

Total Estimated Biennial Revenue: \$1,920,250.00

Fee Description:

The fee will be charged biennially to every applicant for renewal of registration.

Fee Objective:

The fee should defray a substantial portion of the State Registration Board for Professional Engineers, Land Surveyors and Geologists' administrative overhead, specifically the difference between the Board's total biennial expenditures and its total biennial revenues from non-renewal sources.

Fee-Related Activities and Costs:

Estimated ending balance on 6/30/04:	(109,531.91)
FOR FISCAL YEAR 04-05	
Estimated non-renewal revenue:	145,000.00
Estimated renewal revenue:	0
Prior year returned funds	474,893.23
Total revenue available:	510,361.32
Estimated expenditures:	781,000.00
Estimated ending balance on 6/30/05:	(270,638.68)
FOR FISCAL YEAR 05-06	
Estimated non-renewal revenue:	140,000.00
Estimated renewal revenue at above rates:	1,920,250.00
Total revenue available:	1,789,611.32
Estimated expenditures:	804,000.00
Estimated ending balance on 6/30/06:	985,611.32

Analysis, Comment, and Recommendation:

It is recommended that the above biennial renewal fees be established to cover projected funding shortfalls between the Board's total biennial expenditures and its total biennial revenues from non-renewal sources.

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF STATE
BUREAU OF PROFESSIONAL AND OCCUPATIONAL AFFAIRS



**STATE REGISTRATION BOARD FOR PROFESSIONAL ENGINEERS,
LAND SURVEYORS AND GEOLOGISTS**
P.O. BOX 2649
HARRISBURG, PENNSYLVANIA 17105-2649

Telephone: (717)783-7049
Fax: (717)705-5540
www.dos.state.pa.us/eng

December 22, 2004

The Honorable John R. McGinley, Jr., Esq.
Chairman, Independent Regulatory Review Commission
Harristown II, 14th Floor
333 Market Street
Harrisburg, PA 17101

RE: Proposed Rulemaking of State Registration Board for Professional
Engineers, Land Surveyors and Geologists Relating to Biennial
Renewal Fees and Examination Fees (16A-478)

Dear Chairman McGinley:

Enclosed is a copy of a proposed rulemaking package of the State Registration Board for Professional Engineers, Land Surveyors and Geologists relating to biennial renewal fees and examination fees.

A notice of proposed rulemaking will be published in the Pennsylvania Bulletin on January 8, 2005, triggering a 30-day public comment period that ends February 7, 2005. In accordance with Section 5(f) of the Regulatory Review Act, the Board will deliver copies of the proposed rulemaking package to the House Professional Licensure Committee and the Senate Consumer Protection and Professional Licensure Committee by the second Monday after the date on which committee designations for the 2005-2006 session of the General Assembly are published in the Pennsylvania Bulletin.

The Board stands ready to provide whatever information or assistance your Commission may require during its review of the proposed rulemaking.

Sincerely,

A handwritten signature in black ink that reads "George Roman PE".

George Roman, P.E., P.L.S., President
State Registration Board for Professional Engineers,
Land Surveyors and Geologists

GR:SW
Enclosure

cc: Leonidas Pandeladis, Acting Chief Counsel
Department of State

Joyce McKeever, Deputy Chief Counsel
Department of State

Cynthia Montgomery, Regulatory Counsel
Department of State

Basil L. Merenda, Commissioner
Bureau of Professional and Occupational Affairs

Gerald S. Smith, Senior Counsel in Charge
Department of State

Steven Wennberg, Counsel
State Registration Board for Professional Engineers,
Land Surveyors and Geologists

**TRANSMITTAL SHEET FOR REGULATIONS SUBJECT TO THE
REGULATORY REVIEW ACT**

I.D. NUMBER: 16A-478

SUBJECT: State Registration Board for Professional Engineers, Land Surveyors and Geologists
Biennial Renewal Fees and Examination Fees

AGENCY: DEPARTMENT OF STATE

TYPE OF REGULATION

- X Proposed Regulation
- Final Regulation
- Final Regulation with Notice of Proposed Rulemaking Omitted
- 120-day Emergency Certification of the Attorney General
- 120-day Emergency Certification of the Governor
- Delivery of Tolled Regulation
 - a. With Revisions
 - b. Without Revisions

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 REVIEW COMMISSION

FILING OF REGULATION

DATE	SIGNATURE	DESIGNATION
_____	_____	HOUSE COMMITTEE ON PROFESSIONAL LICENSURE
_____	_____	SENATE COMMITTEE ON CONSUMER PROTECTION & PROFESSIONAL LICENSURE
12/22/04	<i>J. Helmer</i>	INDEPENDENT REGULATORY REVIEW COMMISSION
_____	_____	ATTORNEY GENERAL (for Final Omitted only)
12/21/04	<i>Majra Garcia</i>	LEGISLATIVE REFERENCE BUREAU (for Proposed only)