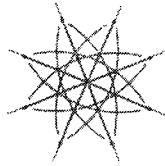


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Pennsylvania Academy of Cosmetology

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September 10, 2007

Hilarene Staller, Administrator
State Board of Cosmetology
P. O. Box 2649
Harrisburg, PA 17105-2649

Dear Ms. Staller:

In response to the "Proposed Rulemaking – State Board of Cosmetology (49 PA CODE CH. 7) General Revisions dated Saturday, August 25, 2007", I have the following comments.

The Pennsylvania Academy of Cosmetology is dedicated to providing the best and most current education in the cosmetology fields. We strive to maintain the curriculum and equipment with the latest technologies to enable our students an easy transition from student to knowledgeable employee. This necessitates the replacing of out-dated and overly-used equipment on a regular basis.

I am enclosing some pictures of our most recent remodeling jobs completed on our clinic floor. Please notice the two new pedicure stations, three new facial steam machines with chairs, 19 new styling chairs, four new manicure stations, six new dryers and five new European shampoo bowls. This upgrade was done at a cost of \$70,864.96 which is a monthly payment of \$1,289.65.

Let us not leave out the fact that new towels need to be purchased every six months. In addition, of course, they must be washed and dried. I, recently, had to replace our washer with a price tag of \$586.16. The dryer was replaced a year ago at a cost of \$490.77.

We, normally, have two teachers on the clinic floor on a daily basis. I am having a hard time getting them to work for free. They have families and bills just like everyone else. They need paid a competitive salary to survive. Since NACCAS mandates us to display a sign that reads "All work performed by supervised students", the teachers are required to be present.

We, also, need electricity and gas to keep the students and clients cool in the summer and warm in the winter. This, also, keeps the materials used in the clinic from going bad. On one of the

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manufacturer's material data safety sheet, it reads "Store in a dry area at normal temperatures. Avoid storing at high temperatures. Avoid freezing temperatures."

Although the water and sewer bills are not an astronomical amount of money, they are additional costs.

It is because of the above reasons that it is absurd not to include the mentioned costs into the cost of materials when doing services for the public. Our haircuts are \$5.50 and a perm starts at \$23.00. If we charged for materials only, the cost of a haircut would be \$0.18 and a perm would be \$2.28. These prices would be so low that it would be impossible to keep up with the demand that this would create. This would, also, keep customers from going to the local salons and would put them out of business. This in turn would put the cosmetology schools out of business because the graduates would have no place to seek employment.

In closing, I hope you can understand the points mentioned and take these into consideration.

Sincerely,



Daniel J. Leaser
President/Owner
Pennsylvania Academy of Cosmetology



