

#2704



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INDEPENDENT REGULATORY
REVIEW COMMISSION

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July 28, 2008

Hand Delivered

Janet L. Dolan
Director, Bureau of Driver Licensing
Riverfront Office Center
1101 South Front Street, 4th Floor
Harrisburg, PA 17104

**RE: Comments Regarding Regulations ID # 18-411(#2704) and
#18-410(#2705)**

Dear Ms. Dolan:

Allow this correspondence to serve as the comments of the Pennsylvania Chiropractic Association to the two above-referenced Regulations of the Department of Transportation, which were published in the Pennsylvania Bulletin at Vol. 38, No. 26 on June 28, 2008.

The Pennsylvania Chiropractic Association ("PCA") is a statewide organization representing the interests of licensed Doctors of Chiropractic and with a membership in excess of 1,000 doctors.

As counsel to that fine organization, we commend the Department for its amendment to §§ 83.1 and 83.2 so as to include Doctors of Chiropractic within the allowable class of providers. As you know, Doctors of Chiropractic are direct access providers, who serve a critical role in the delivery of healthcare to consumers throughout the Commonwealth of Pennsylvania. They are comprehensively educated and fully trained in all aspects of healthcare delivery and are certainly more than competent to be included within the Department's relevant Regulations.

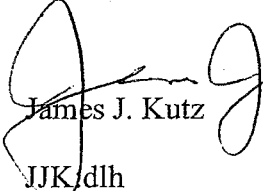
As to the proposed amendments to Chapter 71 relating to school bus drivers, we note that Doctors of Chiropractic are already included within that chapter. Accordingly, we commend the Department again, and urge the immediate adoption of both sets of Regulations as proposed.

In closing, we are pleased that the Department and the Administration see fit to appropriately include Doctors of Chiropractic, and we look forward to seeing final rule-making in the Pennsylvania Bulletin within the near future.

Janet L. Dolan
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If you have any questions, please feel free to contact the undersigned, or Mr. Gene Veno, who serves as the Executive Vice-President of PCA at 717-232-5762.

Very truly yours,

 *Kutz* ^{AEV}
James J. Kutz
JJK/dlh

cc: Gene Veno, Executive Vice-President