

2762

Blackburn, Thomas

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From: Kocher, Terrie
Sent: Tuesday, May 05, 2009 4:44 PM
To: Blackburn, Thomas
Subject: FW: Reference No 16A 4710 (Continuing Education)

2009 MAY -8 PM 2: 42

INDEPENDENT REGULATORY
REVIEW COMMISSION

-----Original Message-----

From: Blumenschein, Charles [mailto:Chuck.Blumenschein@veoliawater.com]
Sent: Tuesday, May 05, 2009 2:43 PM
To: ST, ENGINEER
Subject: Reference No 16A 4710 (Continuing Education)

Robert C. Grubic, P.E. PLS:

I would like to object to a couple portions of the proposed continuing education requirements for Professional Engineers. Specifically;

Section 37.113, subpart e.

I feel that continuing education credits should be provided for the publication of technical articles. A significant amount of research, time and effort in put forth in the development of a technical article. To deny that this is not continuing education is not justified.

Section 37.115

Our company provides continuing education programs for our engineering staff as well as at our training facility in France. In the U.S. we conduct more than 20 courses per year which are all related to our engineering practices. We have professional engineers prepare the presentations. It is simply not practical for us to submit these courses to board for approval, nor is it practical for us to comply with the provisions of subpart (a) and (b) of this section as well as submit a \$100 fee for each coarse we are requesting approval.

I am requesting an additional provision be added to this section which allows corporations to monitor and certify that courses provided meet the requirements of continuing education necessary for the training of their employees.

Respectfully submitted,

Charles D. Blumenschein, P.E., DEE

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5/5/2009