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Richard Finn CMT

133 Jefferson Road, Suite 101, Pittsburgh, PA 15235 Phone: 412-244-3240 ~ Fax: 412-244-3241

Email: painschool@earthlink.net

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Ms. Michaele A. Totino Regulatory Analyst Independent Regulatory Review Commission 333 Market Street, 14th floor Harrisburg, PA 17101 RECEIVED

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INDEPENDENT REGULATORY REVIEW COMMISSION

Dear Ms. Totino.

I would like to speak against the adoption of the regulations for massage therapy at the November 18th meeting..

I urge his because:

- 1. The term "Therapeutic Massage" has been removed from the regulations. This is a massage industry specific term. Its use is universal. I offer the following arguments:
 - a. In an attached google search for "therapeutic massage" "PA" I received 135,000 hits. I printed out the first 10 pages. There were about 10 listings per page. 5 were related to training for massage therapy. 4 were for "Non Therapeutic" massage. These were for relaxation. 1 was for domain name searches. The rest were sites for massage therapists doing "therapeutic massage."
 - b. I have attached the covers of 5 massage textbooks. 4 of these were published by the 2 largest medical publishers in the country. They all include "Therapeutic Massage" on the cover.
 - c. On of the board approved certifying exams includes "Therapeutic Massage" in its very name.
- 2. I am very concerned that the Physical Therapy Association recommended getting rid of the term "Therapeutic Massage" and replacing it with the term "Massage Therapy." I do not know why they object to the adjectival form of the word. I can not conceive that it is a threat. I do worry that they have more sinister ideas of using this terminology to restrict the trade of Therapeutic Massage. I believe it will be used as a tool for selective prosecutions of those who do therapeutic work. All of us learn therapeutic work in school. We are all potential targets. As such, I support voting against the regulations.

Thank you for your attention.

Richard Finn CMT