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From: Davis, Gregg
Sent: Thursday, May 21, 2015 2:47 PM
To: ST, Regulatory Counsel
Subject: PROPOSED RULEMAKING

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PROPOSED RULEMAKING

STATE REGISTRATION BOARD FOR PROFESSIONAL ENGINEERS, LAND SURVEYORS AND GEOLOGISTS

[49 PA. CODE CH. 37]

Renewal Fee

[45 Pa.B. 2368]

[Saturday, May 16, 2015]

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

Regulatory Unit Counsel,

I would like to go on record as being **opposed** to the proposed doubling of the biennial renewal fees for Engineers, Land Surveyors, and Geologists.

Section 9(a) of the Engineer, Land Surveyor and Geologist Registration Law (act) (63 P. S. § 156(a)) requires the Board to increase fees by regulation to meet or exceed projected expenditures if the revenues raised by fees, fines and civil penalties are not sufficient to meet expenditures over a 2-year period.

This regulation is what is structurally wrong with the Commonwealth of Pennsylvania's Legislative and Administrative process. The rhetoric that is constantly pushed forward is all about increasing revenues. Where is the accountability of reducing expenditures, and as a taxpayer I think I have a right to know what reduction measures have been taken.

"The vast majority of licensees are considered to be working for small businesses. They will be impacted because their license fees will increase. The proposed rulemaking should not have other fiscal impact on the private sector, the general public or political subdivisions of this Commonwealth."

Really!! I would like to know how the Board can make this statement with a clear conscience? How can the board state the registrant will be impacted by the fee increase and then in the next sentence state the proposal should not have a fiscal impact on the private sector? My next question is where is the majority of the revenue being spent? I would find it hard to believe that the cost associated with maintaining biennial registration is that great.

"A small percentage of its revenue comes from other fees, fines and civil penalties". Based on past business administration experience these are the most labor intensive activities to administer. Has the Commonwealth conducted a labor study to accurately identify cost centers? Call me cynical, but I believe it is far easier, for the Board, to raise the biennial renewal fees than it is to raise fines, civil penalties, and other fees. Please correct me if I am incorrect.

Additionally, along the lines of not having a fiscal impact on the private sector, as a registered Professional Land Surveyor I have been required to obtain 24 continuing education credits for the past several renewal cycles. The least expensive credits that I have been able to obtain, fall in the neighborhood of \$10.00. Ten dollars per credit and 24 credits required every biennial cycle equates to an additional \$240.00. Don't get me wrong I'm not completely against continuing education requirements, just stating the unintended consequences. \$240.00 continuing education, plus \$100 biennial reg. fee = \$340.00, yep no fiscal impact there!!

I am certain I'm not alone in my disgust with this action. Maybe I would be a lot less cynical if there was complete transparency and full financial disclosure by the Board of Registration. Actually, now that I have made my position of opposition known, I will be expecting to receive my notice of continuing education audit in the near future.

Respectfully,

Gregg A. Davis, PLS