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Blackburn, Thomas

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IRRC

From: Stahl, PE Timothy
Sent: Thursday, May 21, 2015 11:14 AM
To: ST, RegulatoryCounsel
Subject: PROPOSED RULEMAKING

2015 MAY 25 PM 2: 12

5/21/2015 <http://www.pabulletin.com/secure/data/vol45/45-20/910.html>

RE: Proposed rulemaking to the REGISTRATION FEE for Professional Engineers, Land Surveyors and Geologists

Regulatory Unit Counsel,

I am opposed to this drastic DOUBLING of the professional registration fee.

While it appears to be a very convenient, easy, single step to make your department solvent, it puts great burden upon the fee-paying professionals.

We should not strive for easy, we should strive for fair and appropriate.

What cost cutting has been done?

What waste has been trimmed?

Like all bureaucracy, the error is not FIRST cutting all waste before asking for a second helping.

Ask yourselves:

"Is the service that professionals receive from this department worth such a cost?"

For most, the simple act of re-registering professionals and the costs associated with data entry should be very minimal.

"Has the cost burden been put upon the appropriate party?"

The bureau farms out the vetting process for new engineers (Professional Credential Services, Inc), is that the most cost effective?

A digital, online PE exam will save significant money over renting locations for testing, having proctor personnel, etc. same as the FE has.

EIT holders pay no registration fees on their license and many coast through their entire career (either not taking or not passing the PE)

Use of the title ENGINEER (engineer, senior engineer, et al) should be for license holders only.

"Since professional misconduct and prosecution seems to take significant revenue, shouldn't we instead increase fines on those who deserve it?"

I suggest looking closer at your costs and what situations incur them, then assign increases to the appropriate party/parties.

I am a **level 8 - step 6** Senior Civil Engineer with DEP in the commonwealth – that means I gross less than \$60k/ year.

- Payroll taxes are high enough, but consider that property taxes (I have a modest, old home in town, not the suburbs) are high as well
- I drive 40 miles to work, one-way, and cannot afford to move or live closer to work as the property values and taxes are higher still.
- "Fair Share" dues are taken from me at the rate of ~1.15% of earnings, though I choose no union.
- I am not offered overtime so what I get, is all I get.
- Title 49, chapter 37 mandates a continuing education requirement (for licensees only, not EIT, SIT, etc) – this is an added burden & expense that many don't share.

- I am discouraged from having other jobs by the commonwealth (not that I should HAVE to work two jobs as a licensed engineer in order to have a good living).
- I have thousands in student loans to repay and worked very hard to achieve this license.
- Despite my job description stating it is MANDATORY to have a PE license, the commonwealth has promoted many NON-LICENSED professionals in my bureau to Senior Civil Engineer status. They pay no registration fees, but enjoy the same pay levels.
- The reward in the private sector for being licensed versus unlicensed is the pay gap, which the commonwealth has artificially bridged.

Tell me why I should have to pay \$100 every two years just to have the “privilege” of working in my trade, so you can conveniently dump your fiscal shortfall upon us licensed professionals, while many others are exempt from registration fees, continuing education requirements, and possible misconduct investigations?

\$100 is not a trivial amount of money. Just because gasoline and other costs seem to skyrocket, it doesn't mean that we should readily accept YET ANOTHER INCREASE.

Ohio charges \$40/2yrs <http://www.peps.ohio.gov/Fees.aspx>

Maryland charges \$76/2yrs <http://www.dllr.maryland.gov/license/pe/peaff.shtml>

Please reconsider.

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