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Blackburn, Thomas

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**From:** Michael Napolitan <mike@taylorgeoservices.com>  
**Sent:** Wednesday, May 27, 2015 11:38 AM  
**To:** ST, RegulatoryCounsel  
**Subject:** Proposed Rule No. 16A-4713 (renewal fee)

2015 JUN -2 AM 9: 24

Regulatory Unit Counsel;

I am writing to **oppose** the proposed increase in the license renewal fees for Professional Engineers, Land Surveyors and Geologists. In reading the proposed rulemaking package on page 12, it is clear that there were recent changes that have led to increased spending at the board office on legal counsel in FY 2010-2011 (\$135,423.95 to \$220,016.00) which has surprisingly resulted in a decrease in civil penalty revenue (\$35,000 to \$14,850.00). In addition, the new applications and renewals have decreased from FY 2006-2007 to the present, thereby reducing the work load on the office and revenue. The last anomaly in spending that I will note occurred in FY 2011 to 2012 when the BPOA Administration expense jumped from \$471,973.06 to \$674,953.10.

There are no indications in the package addressing the board office increases first and then addressing the short fall by increasing fees. I recommend reducing the legal office budget, increase civil penalties, reduce BPOA administration costs and Board Member expenses first. Reduced new applications and renewals should lead to staff reduction in the board offices.

Sincerely,

Michael Napolitan, P.G.

**Taylor GeoServices**

38 Bishop Hollow Road  
Newtown Square, PA 19073  
Mobile: 610-547-0118  
Office: 610-325-5570  
[www.taylorgeoservices.com](http://www.taylorgeoservices.com)