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Blackburn, Thomas

From: loos, Mark <mioos@skellyloy.com>
Sent: Friday, June 12, 2015 9:27 AM
To: ST, RegulatoryCounsel
Cc: Rose Jeffries ; Donald Wagner
Subject: Comments on Reference No. 16A-4713 (Renewal Fee) - Professional Engineers, Land Surveyors, and Geologists

2015 JUN 16 PM 3:11

Dear Mr. Brinkash:

Greetings.

In accordance with the provisions contained in the announcement published in the Pennsylvania Bulletin regarding proposed changes to the biennial Renewal Fee for Professional Engineers, Land Surveyors, and Geologists (i.e., Reference No. 16A-4713), the Pennsylvania Council of Professional Geologists (PCPG) is pleased to provide the State Registration Board with the following comments received from our members on the proposed increase in biennial renewal fees.

1. Our members have commented that they are glad that the Commonwealth has a licensing program for Geologists, and are willing to pay a "fair" amount to have the licensing program maintained. Not knowing, however, what does the Board does with the funds it receives and their budget (i.e., details on administrative and staff costs), several members commented that the doubling of the biennial renewal fee seems arbitrary. More detailed information justifying the amount needed for the proposed increase would be welcomed.
2. Because little information is known about the expenses of the Board, comments were received from our members inquiring if the Board has considered implementing procedures to control expenditures rather than increasing the biennial renewal fees?
3. Several members have commented that the proposed doubling of registration fees is a relatively large increase in these difficult economic times, and the Board should consider phasing-in only a moderate increase.
4. Some of our members who hold dual registration as both a licensed Professional Geologist and Professional Engineer would be impacted doubly by the proposed biennial renewal fees. Would the Board entertain a cost break on the biennial renewal fees for professionals holding dual registration?
5. We received comments from members who are retired but still continue to maintain their license as a Professional Geologist. This additional registration cost increase represents an unreasonable additional expense for retired individuals. Would the Board consider offering retired individuals a cost break on the biennial renewal fees?

Thank you for the Board's consideration of our comments. If you have any questions, I can be reached by calling 717-232-0593.

Sincerely,

Mark B. loos, P.G.
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