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DOCKET NUMBER

PETITION RULE PRM 170-3

(571-R46818)

P.O. BOX 519

**Dickinson County  
Board of County Road Commissioners**

IRON MOUNTAIN, MICHIGAN 49801 '92 DEC 14 P3:22

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IRON MOUNTAIN

December 11, 1992

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IRON MOUNTAIN

PATRICIA LA COMBE, OFFICE MGR.  
BREITUNG TOWNSHIP

DAVE PAJULA, PROFESSIONAL ENGINEER  
IRON MOUNTAIN

Secretary  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Attention: Docketing and Service Branch

Dear Sirs:

We would like to comment on the proposed amendment to the rules requested by the American College of Nuclear Physicians and the Society of Nuclear Medicine. We object to items one and two, in which they request an exemption from the fees, for medical licenses, similar to that received for non-profit institutions. We do agree with items three and four, especially with regard to the point made about a sliding scale of fees.

We do not feel that the petitioners have any more of a unique situation than we or other governmental agencies have. Also, we do not feel that the circumstances with regard to their reimbursement are unique just because they can not recover all of their costs. The Dickinson County Road Commission purchased a nuclear moisture/density gauge a number of years ago in order that testing could be performed on construction projects to help insure that the work done by the Road Commission, or by contractors, would result in a quality finished product that would have a longer service life. Much of the testing we perform on federal or state funded projects could be waived, as many other counties and cities do, however, the Dickinson County Road Commission has committed to the providing of equipment, training, and personnel to perform quality control because we are concerned about spending public money wisely.

Being a governmental agency, we have not been able to recover the initial \$5,000 investment nor are we able to be reimbursed in any manner to cover costs for the annual fees. Consulting firms who can provide the same type of quality control service can recover costs by passing them on to clients. For now, we are willing to absorb these additional costs to provide this service but we will continue to assess the circumstances and benefits and may terminate our license in the near future.

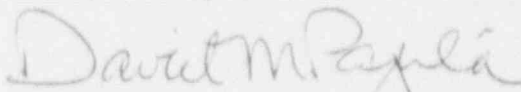
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I you consider providing exemptions to medical licenses, you should seriously consider providing exemptions to Road Commissions and other governmental agencies who also have unique circumstances regarding reimbursement.

We do not object to paying some form of an annual fee. We do however feel that an annual fee of \$2,300 is not reasonable for the administration of our license, especially considering that the initial cost of the equipment it covers on only \$5,000. We also feel that our annual fees were not assessed correctly based upon our "jurisdiction." The petitioners idea of a sliding scale of fees would seem more equitable and could possibly result in a fee that would justify the continuance of our license.

Very Truly Yours,

A handwritten signature in cursive script, reading "David M. Pajula".

David M. Pajula, County Highway Engineer  
Dickinson County Road Commission

sjl/DMP