

**From:** Anthony Kirkwood  
**To:** Chris Wolf; Christine Hite; Jonathan Rivera; M. Ellen Poteat; Tammy Croote; Tim Harris; William Petersen  
**Date:** 1/10/05 3:21PM  
**Subject:** Re: GL fees - 170 vs. 171?

Tammy,

In my novice, simplified opinion, the resources are for the 1327 registrable GL's and for contract and regional resolution of those that don't respond, respond that device whereabouts are unknown, or respond that they never possessed the device(s).

Tony

>>> Tammy Croote 01/10/05 01:34PM >>>

Thanks for the input. I've spoken to some folks here and don't believe that changing the GL fee to a Part 171 annual fee will work for a number of reasons, such as that we treat annual fees differently in terms of billing, tracking, pro-rating, etc.

I do have another question for the GL program folks. Are the budgeted resources in FY05 for the GL program intended to support the approx. 1,327 'registrable GLs' + exempted GLs in FY05, or are the budgeted resources for your program intended to support a significantly larger number of GLs but many GLs just don't register? E.g., do you spend a fair amount of resources on sending notices to GLs that never respond, or are most of the resources in this program associated with the approx. 1,300 + exempted GLs that are actually registered?

>>> Anthony Kirkwood 01/10/05 01:16PM >>>

Tammy,

The only difference I see is that Part 171 appears to be all holders of specific licenses whereas Part 170 appears to be broader. Perhaps Brenda Brown in Fees or some of the folks who were around when the decision was made have more insights. Jonathan Rivera will be back later this week.

Tony

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>>> Tammy Croote 01/10/05 12:05PM >>>

Do you know why the GL fee, as it is currently established, is a Part 170 'registration' fee that needs to be paid annually, vs. a Part 171 annual fee? This has implications for fee relief for GLs.

The proposed FY05 fee (under Part 170) for GLs is \$1,500, up from \$610. We offer reduced fees of \$2,500 for small entities, or \$500 for 'very small' entities--but only for Part 171 annual fees, not Part 170 fees. If we switched the fees for GLs from a Part 170 'registration' fee to a Part 171 'annual' fee, those that qualify as 'very small' entities could pay the reduced fee of \$500 instead of \$1,500.

Thanks,

Tammy

**CC:** Brenda Brown; Rosalyn Jones; William Blaney; William Ward