



March 15, 2006

Mr. Richard K. Struckmeyer
Materials Safety and Inspection Branch
Division of Industrial and Medical Nuclear Safety
Office of Nuclear Materials Safety and Safeguards
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001
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29-23921-01

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SUBJECT: Response to Request for Additional Information - Notification of Pending Change of Ownership, Richard Barry Marketing Group, Materials License No. 29-23921-01, Exempt Distribution License No. 29-23921-02E

Mr. Struckmeyer:

This is a response by Richard Barry Marketing Group (RBMG) to your letter dated February 17, 2006, requesting additional information from the Transferee referred to in our letter dated February 13, 2006. That letter was assigned Mail Control #022529 by your office and Mail Control # 138385 by NRC Region I. This information has been prepared in accordance with the applicable guidance in NUREG 1556, Volume 15, Section 5.

After careful deliberation by all parties, RBMG has decided to take the following action, subject to NRC approval:

1. As stated in the above referenced letter, RBMG is undergoing a change in ownership. The two current owners are Mr. Richard Timbo, located at the licensed facility in Closter, NJ, and Mr. Barry Cohen, located at another office in Mill Valley, CA.

Mr. Richard Timbo (Transferor) is selling his shares of stock in RBMG pursuant to a Stock Purchase Agreement currently being drafted (the "Stock Purchase Agreement"). However, the purchasing entity (Transferee) has been changed from an individual (as stated in the referenced letter) to a company, whose duly authorized representative is Mr. Ronald Bernheim. The Transferee's name and address are as follows:

ASICO Ltd.
2308 Metrol plaza II
223 Hing Fong, N.T.
Hong Kong

138385

NMCS/REGIONAL MATERIALS-002

NOTE: The transaction date has been moved to March 21, 2006. We respectfully request that the NRC approve the change in ownership/control prior to that date.

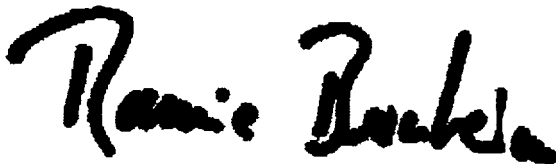
2. Notwithstanding this change in ownership, the Licensee, Transferor, Transferee, and Surviving Partner commit to the following until such proposed changes are submitted for NRC review and approval:
 - a) The licensed facility will remain at the current address.
 - b) All licensed activities, including current surveillance requirements and resulting records/documentation will continue at the current licensed facility or at the manufacturer's facility as specified in the applicable licenses and documents incorporated by reference.
 - c) All personnel specified on the license will remain in their current capacities.

Mr. Richard Timbo (Transferor) maintains his commitment to abide by all constraints, license conditions, requirements, representations and commitments identified in and attributed to the existing licenses as stated in the previously submitted letter dated February 13, 2006. The Transferor reinforces his commitment by signature below.



Richard J. Timbo, Transferor
Licensee Certifying Official
Richard Barry Marketing Group
81 Ruckman Road
Closter, NJ 07624

ASICO Ltd. (Transferee) is committed to abide by all constraints, license conditions, requirements, representations and commitments, previously made by the Transferor, as identified in and attributed to the existing licenses. The Transferee demonstrates his commitment by the signature below of Mr. Ronald Bernheim, a duly authorized representative of the Transferee.



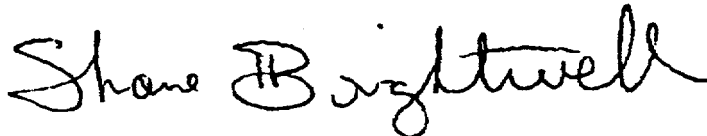
Ronald Bernheim, Transferee
Richard Barry Marketing Group
81 Ruckman Road
Closter, NJ 07624

Mr. Barry Cohen is the "Surviving Partner" in the transaction. The Surviving Partner also maintains his commitment to abide by all constraints, license conditions, requirements, representations and commitments, previously made by the Transferor, identified in and attributed to the existing licenses. As such, the Surviving Partner will become the new licensee contact in place of the Transferor. The Surviving Partner demonstrates his commitment by signature below.



Barry Cohen, Principal
Surviving Partner
Richard Barry Marketing Group
301 Poplar Avenue
Mill Valley, CA 94941
Tel: 415-388-4949
Fax: 425-388-8989
Mobile: (415) 699-4949
bscluminox@aol.com

Mr. Michael S. Brightwell is the Radiation Safety Officer (RSO) of Record. The RSO has reviewed the contents of the pending transaction and believes/commits that there will be no resulting reduction in the effectiveness of the licensed program; particularly, the radiation safety program. All required surveillance has been performed, documented, and reviewed (including results) by the RSO as documented in the RSO audits maintained on file at the licensed facility. Additionally, the program was inspected by an NRC representative on January 18, 2006. The RSO will continue to be directly involved in all licensed activities, and demonstrates his commitment by signature below.



Michael S. Brightwell
Radiation Safety Officer
Richard Barry Marketing Group
81 Ruckman Road
Closter, NJ 07624

3. After the closing of the transaction contemplated by the Stock Purchase Agreement, RBMG is scheduled to merge into a newly formed Delaware corporation. The name of the surviving corporation will be **Lumondi, Inc.** Subsequent to the merger, RBMG will no longer exist. Therefore, the licensee's name and state of incorporation will change, but the licensed facility address will remain unchanged until such a time as the licensee submits an amendment requesting a change.

The original of this letter is being mailed to you at the above address. A duplicate original of this letter is also being sent to Mr. Steven Courtemanche at NRC Region I, at his recommendation, with regard to the possession license.

Please contact Mr. Timbo at (201) 750-8000 or Mr. Michael S. Brightwell at (631) 278-0610 if you have any questions or comments. Please consider that we are on schedule to close on March 21, 2006 subject to your approval.

CC: Mr. Steven Courtemanche
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U.S. Nuclear Regulatory Commission
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