

**PRM-35-20  
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As the Corporate RSO for William Beaumont Hospital, I strongly support this petition for rulemaking. Certificates issued by the ABR and ABMP before October 25, 2005 were recognized before this date and should be grand fathered provision included in 10 CFR 35.57. Individuals certified before this date have had to pursue the alternate pathway, which is an unnecessary burden. This could lead to shortages of medical physicists and RSOs, because only medical physicists and RSOs listed on licenses prior to the regulation may serve as the preceptor for the alternate training condition.

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