

The American Board of Radiology (ABR) writes in support of the AAPM petition for rulemaking (PRM 35-20). The ABR understands that numerous medical physicists who were effective practitioners in therapeutic and /or diagnostic radiologic physics would not be able to attain AMP or RSO status through the "certification pathway" under the new regulations. Nevertheless, they have demonstrated their competence to practice through certification by the ABR and have functioned effectively as medical physicists. If these individuals are restricted to the "alternate pathway", we are concerned that this will have a negative effect on the medical community and possibly lead to an insufficient number of AMPs and RSOs. The ABR does not believe that the NRC intended to negatively impact these practitioners or the hospitals or other healthcare facilities where these individuals worked. Accordingly, the ABR supports the AAPM petition (PRM -35 - 20) and urges the NRC to approve it.

DOCKETED  
USNRC

January 18, 2007 (8:30am)

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**From:** Carol Gallagher  
**To:** SECY  
**Date:** Wed, Jan 17, 2007 4:53 PM  
**Subject:** Comment letter on PRM-35-20

Attached for docketing is a comment letter on the above noted PRM that I received via the rulemaking website on 1/16/07.

The commenter's address is:

Philip O. Alderson, President -- ABR  
5441 E. Williams Blvd, Suite 200  
Tucson AZ 85711

Carol

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**Subject:** Comment letter on PRM-35-20  
**Creation Date** Wed, Jan 17, 2007 4:52 PM  
**From:** Carol Gallagher

**Created By:** CAG@nrc.gov

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1795-0097.doc	20480	Wednesday, January 17, 2007 4:17 PM

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