

PR-170 and 171
80 FR 15476

8



April 28, 2015

Secretary
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001
Attn: Rulemakings and Adjudications Staff

(Fax: 301-415-1101)

RE: 2015 NRC Proposed Fee Rule - Small Entity Fees
Docket ID NRC-2014-0200

Our firm operates a single Troxler nuclear density gage to test soil compaction for earthwork projects. Our soil testing work is necessary to support projects we design and monitor. However, soil testing represents very little revenue to our firm.

The proposed Small Entity Fee for our operation is \$3,400. The fee for small businesses having less than \$520,000 annual gross revenue is reduced to \$700. Our gross annual revenue for the year 2014 was approximately \$835,000. The small business license fee for firms having \$520,000 to \$7,500,000 in annual receipts is proposed at \$3,400.

From a small business perspective, the broad revenue range encompassing \$520,000 to \$7,500,000 tends to advantage larger firms while burdening smaller entities. Our firm's revenue is at the lower end of this range, yet our fee is the same as another entity with eight to nine times our gross revenue. The license fee is a significant expense to our firm. Please consider establishing lower licensing fees by creating one or more additional steps between the \$520,000 to \$7,500,000 range. For example:

Gross Annual Receipts	Annual License Fee
< \$520,000	\$700
\$520,000 to < \$2,500,000	\$1,500
\$2,500,000 to < \$5,000,000	\$2,500
\$5,000,000 to < \$7,500,000	\$4,000

A fee rate schedule with more steps for small businesses would help reduce the license fee burden on the smaller entities. Establishing reduced fees by creating more steps in the gross annual receipts bracket makes sense to help small business concerns. Firms near the top of the bracket with significantly higher annual receipts should pay more than those at the bottom.

Thank you for the opportunity to respond to the proposed 2015 NRC fee Rule.

Sincerely,

Matthew F. Ostdiek, P.E.
President - Radiation Safety Officer