

ENDOCRINE ASSOCIATES

CONSULTING ENDOCRINOLOGISTS
ENDOCRINE ASSOCIATES LABORATORY
USNRG

170, 171
(57 FR 18095)

ADULT AND PEDIATRIC
ENDOCRINOLOGY
METABOLISM
DIABETES
NEUROENDOCRINOLOGY
PSYCHOENDOCRINOLOGY
REPRODUCTIVE ENDOCRINOLOGY
NUCLEAR MEDICINE

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Secretary of the Commission
Nuclear Regulatory Commission
Washington, D.C. 20555
Attention: Docking and Service Branch

re: Excessive Annual Licensing Fees
License 06-14854-01

Dear sirs or madams:

I have recently received an annual materials licensing fee from the NRC for \$4750.00.

I am informed by the Certification of Small Entity Status for Purposes of Annual Fees that as a private physician with a gross practice income of more than \$250,000 that the above fee is reduced to \$1800.00. While my total practice receipts as an Endocrinologist is greater than \$250,000, my income from Nuclear Medicine procedures is limited to Radioactive Iodide Uptakes and the therapy of hyperthyroidism and approximates \$15,000 annually.

Thus I am required to pay approximately 20 percent of gross Nuclear Medicine income for a materials licensing fee which after expenses may approximate 50 % of my net income from these Nuclear Medicine procedures. I believe that such a policy is not unrealistic, is anti-competitive and not in the best interests of either my patients or I. It makes a mockery of physician efforts at conscientious cost containment in a time of rising medical costs.

As a minimum I would urge the adoption of an annual materials licensing fee of \$400.00 as indicated for private physicians with gross annual receipts of less than \$250,000.00 annually reflecting Nuclear Medicine receipts as opposed to total practice receipts. I urge the NRC to recognize the realities of the practicing non-institutional Endocrinologist and to adjust the present arbitrary and excessive materials licensing fees.

I look forward to hearing from you.

Yours very truly,



Bruce F. Bower, M.D.

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cc: Senator Joseph Lieberman
Representative Barbara Kennelly
American Association of Clinical Endocrinologists

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