

From: [Matt Ostdiek](#)
To: [RulemakingComments Resource](#)
Subject: [External_Sender] Docket: NRC-2018-0292 / 2021 Small Entity Fees
Date: Thursday, March 18, 2021 12:49:28 PM
Attachments: [2021 Fee Letter p.pdf](#)

Docket ID: NRC-2018-0292

Please reference the attached letter regarding the proposed 2021 small entity fees.

Please contact me with any questions.

Thank You,

Matthew F. Ostdiek, P.E.

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RENDEZVOUS ENGINEERING, P.C.

Civil Engineers and Planners in Wyoming and Idaho

March 18, 2021

Secretary

U.S. Nuclear Regulatory Commission

Washington, DC 20555-0001

Attn: Rulemakings and Adjudications Staff

Rulemaking.Comments@nrc.gov

RE: 2021 NRC Proposed Fee Rule - Small Entity Fees

Docket ID NRC-2018-0292

Our 5-person firm operates a single Troxler nuclear density gage at one location 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 Business Entity Fee for our operation is \$4,900. This represents over 75% increase in the past four years (2016 fee was \$2,800). Our gross annual revenue for the year 2020 was approximately \$800,000.

From a small business perspective, the broad revenue range encompassing \$485,000 to \$7,000,000 favors larger firms while severely burdening smaller entities. Our firm's revenue is at the bottom end of this range, yet our fee is the same as another entity almost 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 \$7,000,000 range. For example:

<u>Gross Annual Receipts</u>	<u>Annual License Fee</u>
< \$485,000	\$1,000
\$520,000 to < \$2,500,000	\$2,000
\$2,500,000 to < \$5,000,000	\$4,000
\$5,000,000 to < \$7,500,000	\$6,000

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 2021 NRC fee Rule.

Sincerely,

Matthew F. Ost diek, P.E.

President