



RENDEZVOUS ENGINEERING, P.C.

Civil Engineers and Planners in Wyoming and Idaho

March 15, 2022

Secretary

U.S. Nuclear Regulatory Commission

Washington, DC 20555-0001

Attn: Rulemakings and Adjudications Staff

(Rulemaking.Comments@nrc.gov)

RE: 2022 NRC Proposed Fee Rule - Small Entity Fees

Docket ID NRC-2020-0031

Our small 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 five years (2016 fee was \$2,800). Our gross annual revenue for the year 2021 was approximately \$1,000,000.

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 seven 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 fee tiers 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
\$485,000 to <\$2,500,000	\$2,500
\$2,500,000 to < \$5,000,000	\$5,000
\$5,000,000 to <\$7,500,000	\$7,500

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 tiers 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 2022 NRC fee Rule.

Sincerely,

Matthew F. Ost diek, P.E.

President