

**Record of Consultations Between the U.S. Environmental Protection Agency and  
Respondents to the Information Collection Request:  
“Pesticide Product Registration Maintenance Fee”  
(Consultations conducted in May, 2006)**

1. Kim Davis; RegWest Company, LLC
2. Bob Werdig; Pesticide Registration Association
3. Donna Leventhal; Delta Analytical Corporation
4. William Mahrlburg; Nufarm Americas Inc.



Kim Davis - RegWest  
<kim@regwest.com>

05/15/2006 06:27 PM

To Teresa Downs/DC/USEPA/US@EPA

cc John Jamula/DC/USEPA/US@EPA

bcc

Subject RE: feedback request on the use of the maintenance fee  
filing form

Hello Teresa,

Well, thank you for the opportunity to be a respondent concerning the maintenance fee filing form. Here are my responses:

1) I think the benefits of electronic filing would be ease of submission and speed; not to mention that I could copy my client in on the submission thus saving envelopes and postage.

2) I believe that my business practices could be updated to allow electronic payment of the fee; I would just need to research the costs involved (hopefully, none) and the actual process. I know that I could do electronic filing of the form right now, even if the form was not an interactive pdf, because I have good scanning capabilities.

3) My experience has been that the initial phase of electronic "anything" offers a particular learning curve, and therefore the burden is a bit greater than status quo. However, I do believe that it eventually becomes less burdensome.

4) I have absolutely no concern about the security of electronic signatures. The way I figure it, the first time my signature hit the internet years ago, there was no security. (It's analogous to why I used to keep a post office box and have that as my official business address; I thought it was better not to have my home address on my business cards, letterhead, etc. Then one day when the Post Office was gearing up to close my PO box, I Googled "RegWest Company" and there it was - my home address. No need for that box!)

5) I do so very little with PKI and/or password/PIN systems; I'm not sure I can provide an authoritative opinion. However, I usually regard these as necessary for more confidential matters although, when dealing with financial matters, it may increase some people's level of comfort. I don't believe it is absolutely necessary and may actually provide additional burdens that are not warranted.

In general I'm a fan of anything that can be done on-line, mostly due to the speed and cost savings. It would be wonderful if the forms were interactive pdfs and could be saved to each client's file, prepared and electronically stored. I also think there would be benefits to receiving the "packets" via email. Surely that would have to offer tremendous cost savings to the Agency - no Certified Mail RRR and yet you could get receipt confirmation.

Again, thank you for the opportunity to participate.

Regards,  
Kim

-----Original Message-----

From: Downs.Teresa@epamail.epa.gov [mailto:Downs.Teresa@epamail.epa.gov]  
Sent: Monday, May 15, 2006 1:14 PM  
Cc: Jamula.John@epamail.epa.gov  
Subject: feedback request on the use of the maintenance fee filing form

Thank you for agreeing to provide feedback on the use of the maintenance fee filing form. We need this feedback in order to update the Information Collection Request (ICR). The five questions are to which we need answers are:

. What benefits would your organization realize from electronic submission?

. Could you update your business processes to allow electronic payment of the fees and filing of the form if the Agency offered that option?

. Would electronic reporting, if it were offered, be more or less burdensome than the present method, or would there be no change?

. Are you concerned about the security of electronic signatures?

. Should we require a method such as PKI if you submit electronically, or would a password/PIN system be more appropriate?

We would appreciate it if you could respond by May 31, 2006. If you have any questions please feel free to contact me. Thanks again for your help.

Teresa Downs  
Information Services Branch  
Office of Pesticide Programs  
U.S. Environmental Protection Agency  
phone: (703)305-5363  
fax: (703)305-7670  
Visit <http://www.epa.gov/pesticides>



**Teresa  
Downs/DC/USEPA/US**  
05/22/2006 01:53 PM

To John Jamula/DC/USEPA/US@EPA  
cc  
bcc  
Subject Fw: feedback request on the use of the maintenance fee  
filing form

----- Forwarded by Teresa Downs/DC/USEPA/US on 05/22/2006 01:54 PM -----



**Bill.Mahlburg@us.nufarm.co  
m**  
05/16/2006 10:51 AM

To Teresa Downs/DC/USEPA/US@EPA  
cc  
Subject Re: feedback request on the use of the maintenance fee  
filing form

Teresa,  
Below are Nufarm's responses.  
Bill

· What benefits would your organization realize from electronic submission?

Response: It is unclear whether there would be any significant benefits. There may be modest benefits such as a reduction in paperwork and the time flexibility inherent to electronic submission. However, maintenance fee responses are not extremely voluminous, even for a large number of registered products.

· Could you update your business processes to allow electronic payment of the fees and filing of the form if the Agency offered that option?

Response: If typical bank wire transfers of funds would be accommodated, we foresee no difficulties. We observe that companies with limited numbers of registrations would likely want a credit card option for electronic payment.

· Would electronic reporting, if it were offered, be more or less burdensome than the present method, or would there be no change?

Response: We anticipate that the burden would be unchanged because roughly the same process would be used in an electronic context.

· Are you concerned about the security of electronic signatures?

Response: Yes, but the maintenance fee response is not the most critical interaction with OPP. It may be more appropriate to consider electronic signatures across many types of transactions between registrants and OPP, rather than isolate such considerations to the maintenance fee response. That is not to say that an infrastructure like the previously proposed CROMERRR system is necessary.

· Should we require a method such as PKI if you submit electronically, or would a password/PIN system be more appropriate?

Response: PKI may be more than what is necessary for the maintenance fee response because there is no CBI involved. A password/PIN seems adequate. However, as noted in response to the preceding question, it may be more appropriate to consider security/encryption across many types of transactions between registrants and OPP, rather than isolate such considerations to the maintenance fee response.

William M Mahlburg  
Nufarm Americas Inc  
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delivering the message to the intended recipient, you are hereby notified that any dissemination, distribution or copying of this communication is strictly prohibited. If you have received this communication in error, please delete, destroy and do not save the message. Nufarm Americas, Inc. and its affiliated companies.

Downs.Teresa@epam  
ail.epa.gov To:  
cc:  
Jamula.John@epamail.epa.gov, (bcc: Bill Mahlburg/US/Nufarm)  
05/15/2006 02:14 Subject: feedback request on  
the use of the maintenance fee filing form  
PM

Thank you for agreeing to provide feedback on the use of the maintenance fee filing form. We need this feedback in order to update the Information Collection Request (ICR). The five questions are to which we need answers are:

- What benefits would your organization realize from electronic submission?
- Could you update your business processes to allow electronic payment of the fees and filing of the form if the Agency offered that option?
- Would electronic reporting, if it were offered, be more or less burdensome than the present method, or would there be no change?
- Are you concerned about the security of electronic signatures?
- Should we require a method such as PKI if you submit electronically, or would a password/PIN system be more appropriate?

We would appreciate it if you could respond by May 31, 2006. If you have any questions please feel free to contact me. Thanks again for your help.

Teresa Downs  
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May 31, 2006

Teresa Downs (Downs.Teresa@epamail.epa.gov)  
EPA

Subject: Response on use of the maintenance fee filing form

Teresa, attached are my comments based on my experience with several registrants. Some of them want to handle their own maintenance fee filings and others want us to do everything for them.

1. How long does it take you to complete the maintenance fee filing form.

Answer: a minimum amount of time estimated to be about 10 minutes

2. What benefits would your organization realize from electronic submission?

Answer: Probably minimal because checks must be submitted. It would depend on whether the registrant is a large or a small registrant in an urban or rural area. For a large company, the benefits could be substantial because everything could be submitted electronically, as a part of the move to get away from paper.

3. Could you update your business process to allow electronic payment of the fees and filing of the form if the Agency offered that option?

Answer: For most registrants, yes.

4. Would electronic reporting, if it were offered, be more or less burdensome than the present method, or would there be no change?

Answer: Again, large companies, less burdensome; small companies, more. It would depend on the size of the registrant. Especially for small companies, an important question is whether EPA would waive the banking fees for electronic transfers?

5. Are you concerned about the security of electronic signatures?

Answer: I suggest this would be of minimal concern, generally. I suggest that it would be presumed that EPA would provide a secure system.

6. Should we require a method such as PKI if you submit electronically, or would a password/PIN system be more appropriate?

Answer: Keep it simple, please, so that it can be easily understood by small U.S. companies and foreign companies who generally want to be able to understand the forms that we are filing out for them. Explaining EPA forms to Asiatic registrants can be a challenge.

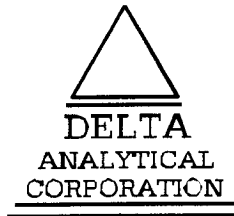
At least for a year or two, could you provide the option of filing electronically or by paper?

If you have questions or need added information, please call me at 202-546-3260 or send me an email.

Regards,

*Geni Werdig*





May 31, 2006

TO: Theresa Downs  
EPA  
Fax # : 703-305-7670  
Tel #: 703-305-5363

FROM: Donna Leventhal

**RE: Feedback request on use of the maintenance fee filing form**

The following is in response to your questions.

1. Q: *What benefits would your organization realize from electronic submission?*  
A: At this time we would not realize any benefit. We represent a number of clients and do not have the capability of paying maintenance fees from Delta's funds. We would still need to mail the check to EPA.
2. Q: *Could you update your business processes to allow electronic payment of the fees and filing of the form if the Agency offered that option?*  
A: Not at this time. Our accounting system is not set up to allocate payments for individual clients. (See # 1 above.)
3. Q: *Would Electronic reporting, if it were offered, be more or less burdensome than the present method, or would there be no change?*  
A: It would be more burdensome because we would then have a 2 step process instead of one.
4. Q: *Are you concerned about the security of electronic signatures?*  
A: Yes
5. Q: *Should we require a method such as PKI if you submit electronically, or would a password/PIN system be more appropriate?*  
A: No opinion at this time.
6. Q: *How long does it take to complete the maintenance fee filing form?*  
A: On average, ½ hour.

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