

**Consultations Conducted for the Renewal of the Pesticide Registration Fee ICR 2013:  
OMB Control No.: 2070-0167      EPA ICR No.: 2147.05**

**Company Name:** RegWest Company, LLC

**Name of person consulted:** Kimberlee Young (formerly: Kim Davis)

**Date:** August 16, 2013

**Q: When preparing your waiver request did you consult the Questions and Answers on the EPA website (<http://www.epa.gov/pesticides/fees/questions/waivers.htm>)?**

A: Yes.

**Q: If yes, did you find it helpful and informative?**

A: Yes.

**Q: What improvements or clarifications would you like to see?**

A: Unless the regulations change, I don't think improvements or clarifications are needed.

**Q: Are you aware of the industry generated form?**

A: Yes.

**Q: Would you use the industry generated form (<http://www.cspa.org/pdf/waiver.pdf>)? If no, please tell us why?**

A: I always use the industry-generated form.

**Labor Rates:**

**Q: The current labor rates for this ICR proposal are \$120.32 for Management; \$77.85 for Technical; and \$44.05 for Clerical. Would you say these labor rates are accurate?**

A: Yes.

**Q: The current labor burden breakdown (the average amount of time each labor category might spend on this task) is displayed in Tables 2, 4, 5, 6 in the supporting statement document. Are these industry averages too high, too low, or just about right for your firm?**

A: Too high.

**Size of your Firm:**

**Does your firm hold 5 or less pesticide registrations, 6-10 registrations, 11-20 registrations, 21 -50 registrations, or over 50 registrations? (See Tables 1 and 2 of the supporting statement).**

A: RegWest Company, LLC does not hold any registrations; however, we oversee more than 50 registrations held by our clients.

**Comments:**

**Q: Did we miss anything?**

A: Not that I can think of.

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**Company Name:** Technology Sciences Group Inc.

**Name of person consulted:** Amy Plato Roberts, Senior Regulatory Consultant

**Date:** August 7, 2013

**Q: When preparing your waiver request did you consult the Questions and Answers on the EPA website (<http://www.epa.gov/pesticides/fees/questions/waivers.htm>)?**

A: Yes.

**Q: If yes, did you find it helpful and informative?**

A: Yes, but it would be helpful to see a practical example posted on the website.

**Q: What improvements or clarifications would you like to see?**

A: Inclusion of a practical example. Often for a company that is going through the process for the first time there is more information needed that one would think by following the guidance. Typically a first time through the process involves the industry generated form, a letter confirming the corporate structure, information explaining affiliates, if any, tax forms reporting revenue or a letter explaining revenue, and tax forms or a letter explaining the number of employees. It would be helpful to see a mocked up response for a company that has tax forms and for a company that does not and must provide explanations. An example of a company that cannot rely solely on tax forms for reporting revenue would be one that has sales other than pesticides and the pesticide sales have to be broken out or a foreign entity that does not use US tax forms for revenue.

**Q: Are you aware of the industry generated form?**

A: Yes.

**Q: Would you use the industry generated form (<http://www.cspa.org/pdf/waiver.pdf>)? If no, please tell us why?**

A: Yes, we do use the industry generated form as it is a helpful way to tie together the different pieces of a fee waiver request. Typically it is included with all the other documentation.

**Labor Rates:**

**Q: The current labor rates for this ICR proposal are \$120.32 for Management; \$77.85 for Technical; and \$44.05 for Clerical. Would you say these labor rates are accurate?**

A: Not able to comment.

**Q: The current labor burden breakdown (the average amount of time each labor category might spend on this task) is displayed in Tables 2, 4, 5, 6 in the supporting statement document. Are these industry averages too high, too low, or just about right for your firm?**

A: Yes, that seems accurate.

**Size of your Firm:**

**Does your firm hold 5 or less pesticide registrations, 6-10 registrations, 11-20 registrations, 21 -50 registrations, or over 50 registrations? (See Tables 1 and 2 of the supporting statement).**

A: We represent a multitude of firms that hit all of the options in Tables 1 and 2.

**Comments:**

**Q: Did we miss anything?**

A: Do not believe so.