

Attachment G - Consultation Response

Below are a series of questions related to the renewal of the Pesticide Registration Fee Waivers ICR; OMB Control No.: 2070-0179, EPA ICR No.: 2330.03. Your response is voluntary. However, should you choose to respond, your response will be published at regulations.gov in the public docket EPA-HQ-2016-0463. As part of the consultation process for this ICR renewal we ask the following:

Company name: **RegWest Company LLC**

Name of person consulted: **Kim Davis**

Date: **February 23, 2017**

When preparing your waiver request did you conduct any research on the EPA websites <https://www.epa.gov/pria-fees> and <https://www.epa.gov/pesticide-registration/pesticide-registration-fees-and-fee-waivers>? Were these resources helpful to you?

A: **I have consulted the websites many times. I find them very helpful, especially when I was preparing the voluntary form for my clients to use as a check list of the required documentation.**

Are there improvements or clarifications that you like to suggest for the waiver resource websites?

A: **Based on my clients' experiences with waiver requests, most problems are encountered in providing sufficient affiliation information and pesticide revenue breakdown when total revenues are from both pesticidal and non-pesticidal sources. However, Christopher Green has been most helpful in resolving these issues.**

A majority of registrants use Pay.gov to pay for PRIA and product registration maintenance fees. Do you use the Pay.gov site?

A: **Yes.**

If you use the Pay.gov website, do you find it helpful? Was the site easy to use?

A: **Pay.gov is the only way to pay PRIA and product registration/maintenance fees since the EPA does not accept checks anymore. I have found it very helpful (and more cost/time efficient) to pay fees on-line and the site very easy to navigate and use. I especially like being able to send multiple payment confirmation emails.**

The projected hourly industry wage rates used to calculate the burden estimates in the Pesticide Registration Fee renewal ICR are \$126.56 for Management; \$71.69 for Technical; and \$42.97 for Clerical. These rates are fully loaded rates. (see Attachment F for wage calculation details). Are these industry averages too high, too low or just about right for your company? Or alternatively, what do you think the appropriate hourly wages are?

A: **As RegWest is a small regulatory consulting firm, I have no direct knowledge of hourly industry wage rates.**

Would you like to submit any additional comments?

A: **Thank you for the opportunity to participate in the survey.**