

To: Jack Peterson, OPM Task Force, John Boelts, Lin Evans, Jimmy Fox, Ken Fredrick, Philip Hemminghaus, Will Rousseau, Kirk Smith, Dave Burns, and Its-Our-Turn.com

Subject: **Stop requiring a QP license for applying UNRESTRICTED pesticides**

Letter: Greetings,

I just signed the following petition addressed to: OPM Task Force.

Stop requiring a QP license for applying UNRESTRICTED pesticides

An unrestricted pesticide is a pesticide that the EPA (Environmental Protection Agency) has determined can be used by the average untrained person with a low risk of harm. All unrestricted pesticides currently used by the pest control industry are available without restrictions to anyone from garden shops, do-it-yourself stores and through the Internet. Homeowners are using exactly the same unrestricted pesticides as the pest control industry. Everyone using unrestricted pesticides is required by Federal law to read and follow the Federal pesticide label.

The EPA and the state of Arizona already require all commercial pest control applicators to hold a certified applicator's license. The purpose of a license is to ensure that minimum standards are met and to provide recourse when they are not.

In the case of a commercial applicator – the person handling and applying the pesticides – the applicator must know and understand the National Pesticide Applicator Certification CORE Manual. The applicator must know and understand the pests he/she will be dealing with and the recommended methods for dealing with those pests. And of course, the applicator is required to use pesticides in accordance with those standards and to follow the Federal pesticide label. To maintain the license, the applicator must also take continuing education classes every year - known in the industry as CEUs.

The QP - or qualifying party - or super applicator - serves no purpose with respect to applying unrestricted pesticides and is redundant. Not even the Agriculture industry requires a QP (called the Pest Control Advisor) to apply unrestricted

pesticides. The certified applicator is already familiar with the requirements to safely and effectively apply pesticides and is already familiar with the pests covered by the license category and is certified by the State.

The QP has been used by the Arizona pest control industry as a barrier to entry - to stop new competition - by requiring that you have a QP to run a business and that the QP have extensive experience (3000 hours) in each category. The only way to obtain this experience is to work for your competition which makes the experience quite difficult to obtain - especially for an existing company wishing to expand into a new category.

There are two large groups already using unrestricted pesticides without training and without licensing and there are no reports of significant harm: homeowners and exempt yard workers. And both of these groups are larger than the entire structural pest control industry. So why should a certified applicator - with all that training and knowledge - need a QP? There are no public safety reasons for requiring a QP for unrestricted pesticides.

You may wish to read the following white paper on responsibility in the pest control industry: <http://its-our-turn.com/ResponsibleParties.pdf> .

Remove all requirements for a QP when a company is only using unrestricted pesticides. Streamline the structural pest control industry and make it efficient. Allow small family businesses to compete and create jobs. Stop blocking job creation.

See <http://its-our-turn.com/> for a detailed white papers on the Arizona pest control industry.

Sincerely,

Signatures

Name	Location	Date
Its-Our-Turn .com		2012-04-01
Kevan Brown	Stanfield, AZ, United States	2012-04-02
George Young	yuma, AZ, United States	2012-04-02
Raymond Rodriguez	Peoria, AZ, United States	2012-04-02
Glenn Hamblin	TUCSON, AZ, United States	2012-04-02
Donald Bowles	Mesa, AZ, United States	2012-04-02
Ben Soto	Paradise Valley, AZ, United States	2012-04-02
Florida Boy	Orlando, FL, United States	2012-04-02
Eugene Trpg	Phoenix, AZ, United States	2012-04-02
Doug Dykstra	Pinetop, AZ, United States	2012-04-02
Keith Kronback	tonopah, AZ, United States	2012-04-02
william cline	Kingman, AZ, United States	2012-04-02
Warren Wheat	Mesa, AZ, United States	2012-04-02
Cody Smith	Mesa, AZ, United States	2012-04-02
Brandon Ingram	Tucson, AZ, United States	2012-04-02
Edward Laurson	Denver, CO, United States	2012-04-04
Anita Jones	Prescott Valley, AZ, United States	2012-04-04
Larry Fletchet	Tucson, AZ, United States	2012-04-07
Paul Staron	Scottsdale, AZ, United States	2012-04-09
Henry Hight	Peoria, AZ, United States	2012-04-09
Mark Noriega	Phoenix, AZ, United States	2012-04-10
Bernardo Aillon	Gilbert, AZ, United States	2012-04-10
Janice Bruse	Marana, AZ, United States	2012-04-10
Rich Saehr	Glendale, AZ, United States	2012-04-13
Ervin Wagner	Prescott Valley, AZ, United States	2012-04-16
lewis huggins	mesa, AZ, United States	2012-04-16
Andy Banks	Phoenix, AZ, United States	2012-04-16
Kristen Boe	Scottsdale, AZ, United States	2012-04-16
LADORA LUCERO	SUN LAKES, AZ, United States	2012-04-16
Gerald Sanchez	Phoenix, AZ, United States	2012-04-17

Name	Location	Date
David Boe	Scottsdale, AZ, United States	2012-04-18
Jason Fletcher	Tucson, AZ, United States	2012-04-18
Phyllis Farenga	Marana, AZ, United States	2012-04-18
Christina Abu-Judom	Phoenix, AZ, United States	2012-04-18
virginia brydle	tucson, AZ, United States	2012-04-19
Wendy McCroskey	Peoria, AZ, United States	2012-04-19
Liz Illg	Phoenix, AZ, United States	2012-04-19
Ernie Muir	Phoenix, AZ, United States	2012-04-19
hunter west	scottsdale, AZ, United States	2012-04-19
Chad Gappa	Scottsdale, AZ, United States	2012-04-19
Derek Herndon	Phoenix, AZ, United States	2012-04-19
Newton Smith	Glendale, AZ, United States	2012-04-19
patrick hassett	Phoenix, AZ, United States	2012-04-20
Tiffany Zettler	Phoenix, AZ, United States	2012-04-20
Steven Haire	Phoenix, AZ, United States	2012-04-20
Dominic Pisaro	Phoenix, AZ, United States	2012-04-20
Char Boe	El Mirage, AZ, United States	2012-04-20
Rick De Luca	Phoenix, AZ, United States	2012-04-24
Jeremy Spilsbury	Mesa, AZ, United States	2012-04-30
Barry Bales	AZ, AZ, United States	2012-04-30
Gary Obenstine	Phoenix, AZ, United States	2012-05-06
Don Ahart	Glendale, AZ, United States	2012-05-06
craig judge	Mesa, AZ, United States	2012-05-13
mitch Stevens	Waddell, AZ, United States	2012-05-14
Susan OMalia-Kellmer	Glendale, AZ, United States	2012-05-15
Shelley Long	Tucson, AZ, United States	2012-05-16
Raymond Gunn	Chandler, AZ, United States	2012-05-29
ken edwards	surprise, AZ, United States	2012-06-03
Peter Archambo	Mesa, AZ, United States	2012-06-05
Charlene Preece	United States	2012-06-13
Mike Simon	Willcox, AZ, United States	2012-06-19
Norman Nipperus	Tempe, AZ, United States	2012-08-27

Name	Location	Date
Robert Lee	Prescott, AZ, United States	2012-08-27
Rushell Wood	Eagle Point, OR, United States	2012-08-28
David Saggio	Scottsdale, AZ, United States	2012-09-18
Kenneth Melroy	Glendale, AZ, United States	2012-09-18
shedy berrios	jacksonville nc, NC, United States	2012-10-02

Petition comments:

George Young, Yuma, AZ 85364, 4/2/12: i'm currently in the pest control industry, I started working in the industry with Truly Nolen as a full time termite tech for four years, and then i went to work for a local company as a full time termite supervisor for about 3 years, and then i went to work for Terminix and while at Terminix I applied to get my QP for both termite inspect and termite. my previous company denied turning in the hours to the state, this went on for a year or so, and finally time had ran out, my 5 year gap. So i was only granted the experience hours from Terminix for the Pest control hours. Now, my only option is to rent a QP from someone, and everyone Ive spoken to wants thousands of dollars a month, just to rent their QP, I feel that the law of 5 years has created a way for other companies to deny the hours, and therefore left me without a way to apply to get my QP in the termite division, where I have the most experience in, and I also have a passion for the work. Thank you,George Young

Robert Lee, Prescott, AZ 86305, 8/27/12: To much arbitrary regulations

David Saggio, Scottsdale 85255, 9/18/12: Because I founded Organic Pest Control,LLC, Allorganic Pest Control, LLC and now TotallySafe.