

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

Subject: **Eliminate experience requirement for qualifying party applicator's license**

Letter: Greetings,

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

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Eliminate experience requirement for qualifying party applicator's license

A qualifying party (QP) applicator's license allows a person to apply RESTRICTED and UNRESTRICTED pesticides within a pesticide category. It also allows the licensed person to supervise, train and otherwise manage licensed applicators who will be handling and applying the same pesticides.

The first issue with 3000 hours of experience in category is that it is arbitrary and excessive and clearly a barrier to entry. Other industries with life safety concerns have much low experience requirements. To put this in perspective, think about commercial pilots. To become a commercial pilot carrying passengers for pay (commercial multiengine rating), you only need 250 hours of flight experience logged – pilots keep a log of hours flown in a personal logbook – and only a small number of those hours require an instructor while the rest are on your own. If a plane crashes, people die. In the case of an airliner, lots of people die. Clearly, planes are not falling out of the sky and killing lots of people due to lack of experience.

Another issue is that if you already work for a company, expanding your QP applicator's license to a new category is very difficult if that company is not already performing the work you want to be licensed for. Essentially, you must quit the company you work for and go to work for a competing company to gain the experience. If you happen to be a company owner, you are essentially required to close your company and go work for one of your competitors – and your competitors may have no interest in hiring you. The experience requirement limits the ability of a company to expand into other categories of pest control and presents a significant barrier to entry.

Another issue is lack of reciprocity. Experience gained in one state does not count in this state. The person does not lose experience just because the person crosses a border but because of the current laws, the person is essentially required to start over. This is a significant barrier to entry.

The pest control industry also has a significant gender bias issue – it is a male dominated industry. There are very few female applicators and business owners. This makes it more difficult for women to get hired and gain the required experience to expand their licenses.

Our solution is simple. The emphasis should be on good educational materials and comprehensive testing. Anyone should be able to study the materials and take the license test without any waiting period or required experience. A comprehensive test will show that the applicant has the required set of skills.

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

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Sincerely,

# Signatures

Name	Location	Date
Its-Our-Turn .com		2012-03-25
john gerodimos	Surprise, AZ, United States	2012-03-26
Keith Kronback	tonopah, AZ, United States	2012-03-26
Robert Thal	Phoenix, AZ, United States	2012-03-26
sheryl marshall	dekalb, IL, United States	2012-03-26
Christopher Wiles	Queen Creek, AZ, United States	2012-03-26
David Jones	Phoenix, AZ, United States	2012-03-26
Darren Hunsaker	Queen Creek, AZ, United States	2012-03-26
Dennis Hancock	Camp Verde, AZ, United States	2012-03-26
Charlene Preece	Mesa, AZ, United States	2012-03-26
Travis Carr	Mesa, AZ, United States	2012-03-26
Ben Soto	Paradise Valley, AZ, United States	2012-03-26
Richard Strickland	Surprise, AZ, United States	2012-03-26
Donald Bowles	Mesa, AZ, United States	2012-03-26
David Herman, CGCS	Cortaro, AZ, United States	2012-03-26
William Cline	Kingman, AZ, United States	2012-03-26
Ryan Coons	Edinboro, PA, United States	2012-03-27
Anthony Petkoff	Pine, AZ, United States	2012-03-27
Anita Jones	Prescott Valley, AZ, United States	2012-03-28
Leesa Hunter	Phoenix, AZ, United States	2012-03-28
Donna Wood	Phoenix, AZ, United States	2012-03-28
Glenn Hamblin	Tucson, AZ, United States	2012-03-29
Ted Molo	Maricopa, AZ, United States	2012-03-29
Rick Tonsing	Fair Oaks, CA, United States	2012-04-01
Henry Hight	Peoria, AZ, United States	2012-04-09
Robert Trout	Glendale, AZ, United States	2012-04-10
Mark Noriega	Phoenix, AZ, United States	2012-04-10
Janice Bruse	Marana, AZ, United States	2012-04-10
Doug Dykstra	Pinetop, AZ, United States	2012-04-10
Rich Saehr	Glendale, AZ, United States	2012-04-13

<b>Name</b>	<b>Location</b>	<b>Date</b>
Ervin Wagner	Prescott Valley, 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
Bernardo Aillon	Gilbert, AZ, United States	2012-04-16
Gerald Sanchez	Phoenix, AZ, United States	2012-04-17
David Boe	Scottsdale, AZ, United States	2012-04-18
Kevan Brown	Stanfield, 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
james seaton	Scottsdale, AZ, United States	2012-04-23
Misty Goodroad	Las Vegas, NV, United States	2012-04-23
Wendell Goodroad	Las Vegas, NV, United States	2012-04-23
Virginia Rench	Cottonwood, AZ, United States	2012-04-23
Rick De Luca	Phoenix, AZ, United States	2012-04-24
Jeremy Spilsbury	Mesa, AZ, United States	2012-04-30
richard nelson	Phoenix, AZ, United States	2012-05-03
Gary Obenstine	Phoenix, AZ, United States	2012-05-06

<b>Name</b>	<b>Location</b>	<b>Date</b>
mitch Stevens	Waddell, AZ, United States	2012-05-14
Shelley Long	Tucson, AZ, United States	2012-05-16
Donald Pleger Sr.	Rio Verde, AZ, United States	2012-05-29
Gerald Bailey	Glendale, AZ, United States	2012-06-02
Peter Archambo	Mesa, AZ, United States	2012-06-05
James Daley	Phoenix, AZ, United States	2012-06-13
Mike Simon	Willcox, AZ, United States	2012-06-19
TOM CAPUTO	TUCSON, AZ, United States	2012-06-19
Lyle Ferguson	Gilbert, AZ, United States	2012-06-28
James Greene	PHOENIX, AZ, United States	2012-07-18
Martin Berryhill	Douglas, AZ, United States	2012-08-27
Robert Lee	Prescott, AZ, United States	2012-08-27
Rushell Wood	Eagle Point, OR, United States	2012-08-28
Dan Atkins	Tucson, AZ, United States	2012-08-30
Tony Long	gilbert, AZ, United States	2012-09-17
JEANNETTE SULLIVAN	GENDALE, AZ, United States	2012-09-17
Richard Reardon	Gilbert, AZ, United States	2012-09-21
Chalet Fuery	Mesa, AZ, United States	2012-09-30
shedy berrios	jacksonville nc, NC, United States	2012-10-02
BARRY bALES	sCTS, AZ, United States	2012-10-16
james m nordlund	Fargo, ND, United States	2012-12-21

Petition comments:

David Herman, CGCS, Cortaro, AZ 85652, 3/28/12: There is no way living in Arizona that I could get 3,000 hours to become a QP in Aquatics.

Leesa Hunter, Phoenix, AZ 85027, 3/29/12: We are a woman owned and operated business. The current QP experience requirements are clearly a barrier to expanding services.

Donna Wood, Phoenix, AZ 85080, 3/29/12: As the owner of a landscape company, I am already held liable and responsible for all actions of my employees and representatives through various agencies, including ROC, OSHA, my insurance company, etc. The Qualifying Party requirement and experience requirement are redundant and of no real purpose other than to create a barrier to entry and prevent fair competition.

Ted Molo, Maricopa, AZ 85139, 3/30/12: Had 16 years of experience in NY and the moment I moved to AZ, all those experience came to nothing. I had to obtain 3000 hours and be supervised by someone with much less industry experience (less than 4 years) than me. NY does not need this requirement and NY has more stringent regulations when it comes to pesticides. Dump the 3000 hour requirement!

Robert Trout, Glendale, AZ 85308, 4/10/12: I am a QP, even I feel the 3000 hour requirement is excessive. If you know the material and can pass the test, you should be good to go.

James Greene, PHOENIX, AZ 85083, 7/18/12: have 12 years as a QP, and a total of 16 years in pest control - the 3000 hour requirement is excessive. The Qualifying Party requirement and experience requirement are redundant and of no real purpose other than to create a barrier to entry and prevent fair competition. I agree - remove the 3000 hr barrier - let us make a living and promote jobs in the state of Arizona!!! its time.

Robert Lee, Prescott, AZ 86305, 8/27/12: It's just more and more control of our freedom as Americans trying to scratch out a living

Tony Long, gilbert, AZ 85295, 9/17/12: I have a QP and feel that I've shown the knowledge needed to own and run a company. If I can pass a simple test there is no reason why I shouldn't be allowed to expand my business into other categories. Especially in these hard times - any advantage will save our homes and family's livelihood.

JEANNETTE SULLIVAN, GENDALE, AZ 85303, 9/17/12: Don't see why QP is any smarter than the applicator and the loss of the QP is devastating to the business.