

Burgos, Alexander N

Subject: FW: [External] 14B NCAC 16 - Private Protective Services Board Rules

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From: McDarris, Charles F. <CMcDarris@bdixon.com>

Sent: Thursday, September 12, 2019 4:57 PM

To: Reeder, Amanda J <amanda.reeder@oah.nc.gov>

Cc: Gray, Jeffrey <JGray@bdixon.com>

Subject: [External] 14B NCAC 16 - Private Protective Services Board Rules

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Amanda,

After speaking with you this morning and later with PPSB Rules Coordinator Jeff Gray, we request that you present 14B NCAC 16 .0804, .0901, and .0909 for Rules Review Commission consideration next week. These three rules are the subject of RRC Staff Opinions, with statutory authority and ambiguity questions being raised. It is my understanding that the Commission will take a position on those rules, and we will then have until next meeting to change the rules to satisfy the Commission's concerns.

In addition, we we ask that the review period be extended until the next meeting for all other pending rules, those being 14B NCAC 16 .0110, .0805, .0806, .0807, .0808, .0809, .0904, and .0906.

Thank you.

Charles McDarris

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