

## Burgos, Alexander N

---

**Subject:** FW: 21 NCAC 29 - Extension Request

**From:** Barden Culbreth [<mailto:barden@recanc.com>]

**Sent:** Tuesday, April 11, 2017 8:02 AM

**To:** Rules, Oah <[oah.rules@oah.nc.gov](mailto:oah.rules@oah.nc.gov)>

**Cc:** Reeder, Amanda J <[amanda.reeder@oah.nc.gov](mailto:amanda.reeder@oah.nc.gov)>

**Subject:** 21 NCAC 29 - Extension Request

Dear Rules Review Commission,

The North Carolina Locksmith Licensing Board is requesting additional time to complete technical changes to its rules as part of the re-adoption portion of the Existing Rules Review.

Throughout the Existing Rules Review process, the NC Locksmith Licensing Board has remained on schedule set forth by the Rules Review Commission and staff. However, at the end of 2016, the Board lost four of its nine members. Two of which were term limited, one was replaced by the outgoing Governor, and one due to death. As the Board's sole administrator and Rule Making Coordinator, I have been educating the new board and its new leadership on the Rules Review Process, including the Board's previous opinions on the Rules (some of which have changed under new leadership.)

Finally, the technical corrections presented by the RRC staff are extremely valuable and necessary to comply with the standards of the RRC and the General Assembly's mandate to review, remove and reform needless rules and regulations. Some of our Rules are almost twenty years old. They contain an overwhelming number of unnecessary, duplicative, and vague qualifying language. Some language is not necessary a rule, but guidance language for our regulated profession. These rules need time to be cleaned up to meet the standards of the RRC.

The NC Locksmith Licensing Board takes this task very seriously and requests additional time to make the technical corrections to these rules.

Thank you for your consideration,

Barden Culbreth  
Director/Rule Making Coordinator  
North Carolina Locksmith Licensing Board  
[www.nclocksmithboard.org](http://www.nclocksmithboard.org)