



BY ELECTRONIC MAIL

The Honorable Ben Grumbles  
Assistant Administrator, Office of Water  
c/o Water Docket  
Environmental Protection Agency  
Mailcode 2822T  
1200 Pennsylvania Ave., N.W.  
Washington, D.C. 20460

Re: Docket ID No. EPA-HQ-OW-2006-0765, Request for Extension of Public Comment Period on the Proposal, "NPDES Permit Fee Incentive for Clean Water Act Section 106 Grants; Allotment Formula" 72 Fed. Reg. 293 (Jan. 4, 2007).

Dear Assistant Administrator Grumbles:

The Office of Advocacy of the U.S. Small Business Administration (Advocacy) respectfully requests that the U.S. Environmental Protection Agency (EPA) extend the public comment period on the above referenced proposed rule for an additional 60 days. Advocacy believes that this extension is necessary in order to allow small businesses and small communities to advise EPA fully on the likely impacts of the proposal. Representatives of small businesses and small communities have contacted Advocacy and expressed their concerns about the proposal, the short time frame for comment on the proposal, and their uncertainty about the economic implications of the proposal.

In the absence of any formal analysis of the proposal's economic impacts on small businesses and small communities, EPA would be well served to allow these small entities to have a better grasp of how the allotment changes would affect them so that they can comment accordingly. Because this proposal would appear to have the potential to significantly affect the water permit fees paid by small businesses and small communities, EPA should want to gather more, rather than less, detailed information from affected sources.

The Office of Advocacy was established pursuant to Pub. L. 94-305 to represent the views of small business before Federal agencies and Congress. Advocacy is an independent office within the U.S. Small Business Administration (SBA), so the views expressed by Advocacy do not necessarily reflect the views of the SBA or the Administration.

We stand ready to assist EPA in its careful consideration of how this proposal will impact small entities. Please do not hesitate to call me or Keith Holman ([keith.holman@sba.gov](mailto:keith.holman@sba.gov)) or (202) 205-6936 if we can be of further assistance.

Sincerely,

Thomas M. Sullivan  
Chief Counsel for Advocacy

cc:Steven D. Aitken  
Acting Administrator, Office of Information and Regulatory Affairs  
Office of Management and Budget