

New Registrant Fee Schedule Calculations

Diversion Control Fee Account



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1 Introduction

Under the Controlled Substances Act (CSA), the Drug Enforcement Administration (DEA) is authorized to charge reasonable fees relating to the registration and control of the manufacture, distribution, dispensing, import, and export of controlled substances and listed chemicals. 21 U.S.C. 821 and 958(f). DEA must set fees at a level that ensures the recovery of the full costs of operating the various aspects of the Diversion Control Program (DCP). 21 U.S.C. 886a(1)(C). Fee revenues are deposited into a separate fund of the Treasury called the Diversion Control Fee Account (DCFA). 21 U.S.C. 886a.

DEA continually monitors the anticipated budget and collections to determine whether the registration fees need to be adjusted. Since the publication of the Notice of Proposed Rulemaking (NPRM) on July 6, 2011 at 76 FR 39318, DEA has revised the fee calculation based on end of the year financial information for Fiscal Year (FY) 2011 ending September 30, 2011 as well as updated budget and registrant population estimates for FY 2013 and FY 2014. The budgets are key factors in calculating fees, as monies may be paid from the Diversion Control Fee Account only in accordance with the budget requests or after notification to the Committees on Appropriations of the House of Representatives and the Senate. 21 U.S.C. 886a(1)(D). The primary updates for purposes of calculating the new fees include:

- Higher unobligated balance, Operational Continuity Fund (OCF), at end of FY 2011.
- Lower FY 2013 and FY 2014 estimated budgets.
- Higher estimates for recoveries from deobligation of prior year obligations.
- Higher registrant population projection.

DEA has determined that registration and reregistration fees need to increase in FY 2012; however, these updates lower slightly the amount required to be collected from fees for the FY 2012 to FY 2014 fee calculation period from that published in the NPRM. DEA estimates that the collection at the new fee level will begin March 1, 2012. The amounts indicated in [Table 1: Registration and Reregistration Fees](#) are the amounts needed in order to fully fund the DCP as required by statute.

Table 1: Registration and Reregistration Fees

Registrants on Three Year Registration Cycle

Registrant Class/Business	Current Three Year Fee*	New Three Year Fee*	Difference Per Year
Pharmacy	\$551	\$731	\$60
Hospital/Clinic	\$551	\$731	\$60
Practitioner	\$551	\$731	\$60
Teaching Institution	\$551	\$731	\$60
Mid-Level Practitioner	\$551	\$731	\$60

*Pharmacies, hospitals/clinics, practitioners, teaching institutions, and mid-level practitioners currently pay a fee for a three-year period. This current three-year fee is \$551. The new fee for the three year registration period would be \$731. The three year difference is \$180 or an annual difference of \$60.

Registrants on Annual Registration Cycle

Registrant Class/Business	Current Annual Fee	New Annual Fee	Difference
Researcher/Canine Handler	\$184	\$244	\$60
Analytical Lab	\$184	\$244	\$60
Maintenance	\$184	\$244	\$60
Detoxification	\$184	\$244	\$60
Maintenance and Detoxification	\$184	\$244	\$60
Compounder/Maintenance	\$184	\$244	\$60
Compounder/Detoxification	\$184	\$244	\$60
Compounder/Maintenance/ Detoxification	\$184	\$244	\$60
Distributor (chemical and controlled substances)	\$1,147	\$1,523	\$376
Reverse distributor	\$1,147	\$1,523	\$376
Importer (chemical and controlled substances)	\$1,147	\$1,523	\$376
Exporter (chemical and controlled substances)	\$1,147	\$1,523	\$376
Manufacturer (chemical and controlled substances)	\$2,293	\$3,047	\$754

The purpose of this document is to allow the reader to understand the various factors that contributed to the calculated fee and how these factors were applied in determining fees.

*** DISCLAIMER ***

ALL ASSUMPTIONS, INPUTS, AND CALCULATIONS CONTAINED IN THIS DOCUMENT ARE FOR THE PURPOSES OF CALCULATING THE FEE ONLY. MANY PROCEDURAL, OPERATIONAL, AND ECONOMIC VARIABLES CAN CAUSE THE ACTUAL RESULTS TO DIFFER FROM ESTIMATES AND PROJECTIONS CONTAINED IN THIS DOCUMENT.

2 Overview of Registrant Fee Calculation Methodology

As the vast majority of registrants are on a three year renewal cycle, the fee calculation is also based on a three year analysis, FY 2012 - FY 2014.

The registration fees were calculated through these five major steps:

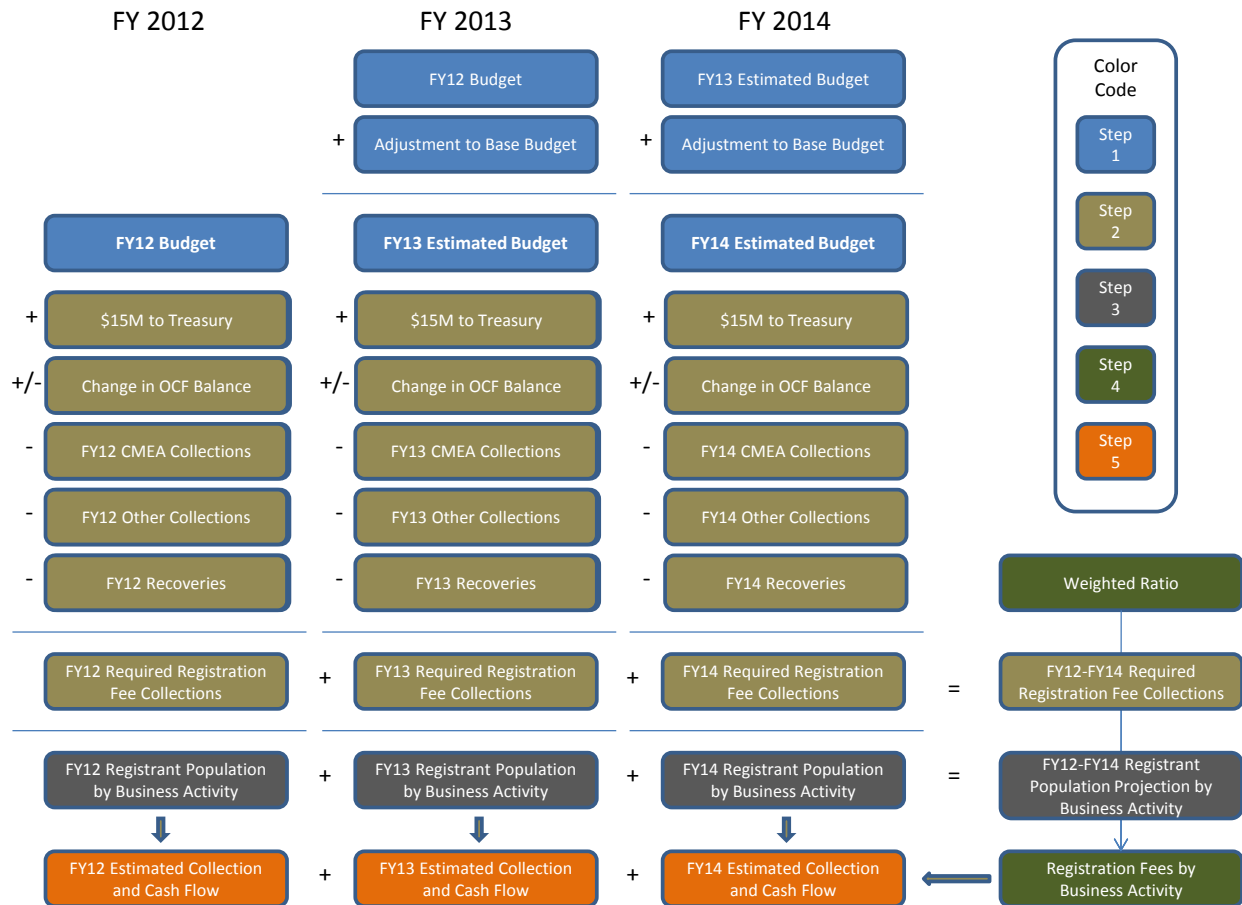
1. Estimate program obligations for FY 2012, FY 2013, and FY 2014. The President's Budget for FY 2012 was released in February 2011. The official FY 2013 and FY 2014 budget requests are released in February of 2012 and 2013, respectively.
2. Determine the total amount of registration fees that need to be collected over the three year period by applying additional factors such as:
 - a. Mandated transfer to the Treasury, which increases the amount to be collected from registration fees.
 - b. Maintenance of the Operational Continuity Fund (OCF) balance, which reduces the amount to be collected from registration fees in this instance.
 - c. Combat Methamphetamine Epidemic Act (CMEA) of 2005 self-certification fee collections, which decrease the amount that needs to be collected from registration fees.
 - d. Other collections from the sale of official government vehicles, which decreases the amount to be collected from registration fees.
 - e. Recoveries from the deobligation of prior obligations (see Section 3.2.5 for explanation), which decrease the amount that needs to be collected from registration fees.
3. Estimate the total number of registration fee transactions¹ by business activity, new and renewal, over the three year period.
4. Apply the weighted ratio to the total required collections and the total number of registrations to determine the various fees per each registrant business activity.
5. Finally, apply these fees to the estimated number of registrations by business activity for each of the three years to determine projected collections per year and estimated OCF balance, based on an estimated fee collection date beginning March 1, 2012. Confirm that the calculated fees allow DEA to recover the full cost of the DCP.

Each of the five steps has multiple sub-steps and components that will be described in Section 3 of this document. Section 3 details the various components and how these components were applied in calculating the fees.

¹ "Number of registration fee transactions" is different from the number of registrants. First, fee exempt registrations are not included in this number. Second, the registrants on the three year registration cycle will register only once in the FY 2012 – FY 2014 period. Since the vast majority of registration (non-fee exempt) fee transactions are on the three year registration cycle, the number of registrations per year is roughly one-third the number of registrants. In calculating the new fee, the "number of registration fee transactions" is a key figure discussed in Section 3.3.

Figure 1: Diagram of Major Components of the Registration Fee Calculation below summarizes the five major steps and key components that were factored into the fee calculation.

Figure 1: Diagram of Major Components of the Registration Fee Calculation



3 Fee Calculation

3.1 Budget: FY 2012-FY 2014

As depicted in Figure 1, the process for estimating the budget for each year is the same. The previous year’s budget provides the base level of DCP activities to which adjustments are made to formulate the budget for the given fiscal year.

Adjustments to base may include adjustments in:

1. Personnel pay and benefits
2. Facilities and rent expenses
3. Task force officer and contractor expenses

3.1.1 FY 2012

The FY 2012 DCFA budget of \$322,000,000 is included in the FY 2012 Consolidated and Further Continuing Appropriations Act, signed into public law on November 18, 2011 (Pub. L. 112-55). For more information, see “U.S. Department of Justice, Drug Enforcement Administration, FY 2012 Performance Budget Congressional Submission” at <http://www.justice.gov/jmd/2012justification/pdf/fy12-dea-justification.pdf>. Also see House Report 112-169 accompanying H.R. 2596, Senate Report 112-78 accompanying S.R. 1572, House Report 112-284 accompanying H.R. 2112, and Public Law 112-55.

3.1.2 FY 2013 Estimate

DEA does not anticipate that it will initiate any significant new initiatives or increases in authorized positions in FY 2013. The FY 2013 estimate includes base adjustments to maintain the positions and program costs as outlined in the FY 2012 President’s Budget. The current estimate of \$352,563,000 for FY 2013 includes the following:

FY 2012 Request	\$322,000,000
Projected Adjustments to Base	
Pay and Benefits	\$20,589,000
Facilities and Rent	\$3,227,000
Tactical Diversion Squad (TDS) Task Force Officers and Administrative Contractors	\$6,198,000
Foreign Personnel Charges	<u>\$549,000</u>
<i>Total Projected Adjustments to Base</i>	\$30,563,000
 Total, FY 2013 Estimated Obligations	 \$352,563,000

The FY 2013 estimated obligations represents only the estimated costs of operating the DCP. The formal FY 2013 DCFA budget will be included in the FY 2013 President’s Budget, which will be provided to Congress in February 2012.

3.1.3 FY 2014 Estimate

Similar to FY 2013, no significant new initiatives or increases in authorized positions are anticipated for FY 2014. However, some base adjustments are projected to fund the full cost of the DCP in FY 2014. To estimate the FY 2014 budget requirement, the average percentage increase from adjustments to base for the six year period of FY 2007 - FY 2013 (excluding any adjustments related to new positions) of 1.57% was applied to the FY 2013 estimate to arrive at the estimated FY 2014 adjustments to base. The full year cost of positions adjustment was calculated using the standard cost modules for estimating costs of personnel enhancements. The FY 2014 estimate of \$364,895,000 includes the following:

FY 2013 Estimated Obligations	\$352,563,000
Projected Adjustments to Base (ATB)	
Estimated ATBs	\$5,523,000 ²
Full year cost of positions added in FY 2012	\$6,809,000
<i>Total Projected Adjustments to Base</i>	<i>\$12,332,000</i>
Total, FY 2014 Estimated Obligations	\$364,895,000

The FY 2014 estimated obligations represents only the estimated costs of operating the DCP. The formal FY 2014 DCFA budget will be included in the FY 2014 President’s Budget, which will be provided to Congress in February 2013.

3.1.4 FY 2012-FY 2014 Summary

	<u>FY2012</u>	<u>FY2013</u>	<u>FY2014</u>
Prior Year Budget		\$ 322,000,000	\$ 352,563,000
Adjustments to Base		\$ 30,563,000	\$ 12,332,000
Budget	\$ 322,000,000	\$ 352,563,000	\$ 364,895,000

² The average percentage increase of 1.57% is rounded to 2 decimal places.

3.2 Required Collections from Registration Fees

As described in Section 2: Overview of Registrant Fee Calculation Methodology, in order to fund the full cost of the DCP, DEA needs to collect enough from registration fees to fund the FY 2012 – FY 2014 budgets and:

1. Make the statutorily required transfer to the Treasury, which increases the amount to be collected from registration fees.
2. Maintain the targeted Operational Continuity Fund (OCF) balance, which reduces the amount to be collected from registration fees in this instance.
3. Includes estimated Combat Methamphetamine Epidemic Act (CMEA) of 2005 self-certification fee collections, which decrease the amount to be collected from registration fees.
4. Adds other collections from the sale of personal property and official government vehicles, which decreases the amount that needs to be collected from registration fees.
5. Estimates recoveries from money not spent as planned (deobligation of prior obligations) (see Section 3.2.5 for an explanation), which decreases the amount that needs to be collected from registration fees.

3.2.1 Transfer to Treasury

In the 1993 appropriations for DEA, Congress determined that the DCP would be fully funded by registration fees and no longer by appropriations.³ Congress established the DCFA as a separate account of the Treasury to “ensure the recovery of the full costs of operating the various aspects of [the Diversion Control Program]” by those participating in the closed system established by the CSA. 21 U.S.C. 886a(1)(C). Fees collected are deposited into a separate Treasury account. Each fiscal year, the first \$15 million is transferred to the Treasury and is not available for use by the DCP. Therefore, DEA needs to collect an additional \$15 million per year for transfer to the Treasury.

3.2.2 Operational Continuity Fund (OCF)

DEA maintains an operational continuity fund (OCF) to maintain DCP operations during historically low (or negative) collection periods (e.g., the first quarter of a new fiscal year when the first \$15 million collected is transferred to the Treasury). Monthly collections and obligations fluctuate throughout the year. There are times when obligations (spending) exceed collections. This can happen consecutively for several months. Therefore, an operational continuity fund is maintained to avoid operational disruptions due to these fluctuations and

³ Departments of Commerce, Justice, and State, the Judiciary and Related Agencies Appropriations Act of 1993, Public Law 102-395, codified in relevant part at 21 U.S.C. 886a.

monthly differences in collections and obligations (spending). Using statistical analysis of the historical fluctuations between amounts collected and amounts obligated, DEA has determined that a reserve fund of \$15 million plus seven percent of the projected obligations is adequate. See [Appendix 2: Target Operational Continuity Fund](#) for an explanation of how this level was determined. The amount reduced to bring the operational continuity fund balance to the \$15 million plus a seven percent level is subtracted from projected costs.

The table below summarizes the targeted OCF balances and the amounts needed to raise the OCF balance to the targeted balance:

	<u>FY2012</u>	<u>FY2013</u>	<u>FY2014</u>
Budget/Estimate	\$ 322,000,000	\$ 352,563,000	\$ 364,895,000
Target OCF (\$15M + 7%)	\$ 39,679,410	\$ 40,542,650	\$ 40,943,670
Beginning OCF balance	\$ 41,726,554	\$ 39,679,410	\$ 40,542,650
Needed Change to Achieve Target OCF	\$ (2,047,144)	\$ 863,240	\$ 401,020
<i>3-year cumulative change</i>			\$ (782,884)

3.2.3 Combat Methamphetamine Epidemic Act of 2005 (CMEA) Collections

Under the CMEA, DEA collects a self-certification fee for regulated sellers of scheduled listed chemical products that are included as part of the total collections. The fee is waived for any person holding a current DEA registration in good standing, such as a pharmacy, authorized to dispense controlled substances. Although DEA has observed an approximately 26 percent decline in self-certifications from FY 2008 to FY 2011, DEA anticipates that the number of self-certifications will stabilize at approximately 5,000 per year from FY 2012 to FY 2014. The self-certification fee is \$21 and is paid on an annual basis. The CMEA self-certification fee collection estimates for FY 2012 – FY 2014 are below:

	<u>FY2012</u>	<u>FY2013</u>	<u>FY2014</u>
Number of paying self-cert	5,000	5,000	5,000
Fee	\$ 21	\$ 21	\$ 21
CMEA collection estimate	\$105,000	\$105,000	\$105,000

3.2.4 Other Collections

DEA also derives revenue from the sale/salvage of official government vehicles dedicated for use in the DCP. DEA’s estimate for other collections is \$533,766 per year. This is the actual amount for FY 2011.

3.2.5 Recoveries from Money Not Spent as Planned (Deobligation of Prior Year Obligations)

At times, DEA enters into an obligation to purchase a product or service that is not delivered immediately, such as in a multi-year contract. Changes in obligations can occur for a variety of reasons, i.e., changes in planned operations, delays in staffing, implementation of cost savings, changes in vendor capabilities, etc. When DEA does not spend the obligated money as planned, that obligation is “deobligated.” The “deobligated” funds are “recovered” and the funds become available for DCP use. Based on historical trends, the recovery from money not spent as planned (deobligation of prior year obligations) is estimated at \$13.5 million per year.

3.2.6 Summary

The required registration fee collections for FY 2012 – FY 2014 are summarized below:

	<u>FY2012</u>	<u>FY2013</u>	<u>FY2014</u>	<u>3-yr Total</u>
Budget/Estimate	322,000,000	352,563,000	364,895,000	1,039,458,000
Recoveries	<u>(13,500,000)</u>	<u>(13,500,000)</u>	<u>(13,500,000)</u>	<u>(40,500,000)</u>
Net Budget	308,500,000	339,063,000	351,395,000	998,958,000
Transfer to the Treasury	15,000,000	15,000,000	15,000,000	45,000,000
Change to Achieve Target OCF	(2,047,144)	863,240	401,020	(782,884)
CMEA Self-cert collections	(105,000)	(105,000)	(105,000)	(315,000)
Other collections	<u>(533,766)</u>	<u>(533,766)</u>	<u>(533,766)</u>	<u>(1,601,298)</u>
Required collections from Registration Fees	320,814,090	354,287,474	366,157,254	1,041,258,818

*Numbers are rounded.

Based on the above, DEA needs to collect \$1,041,258,818 in registration fees over the three year period, FY 2012 – FY 2014 to fully fund the DCP.

3.3 Estimated Number of Registration Fee Transactions: FY 2012 – F 2014

In Section 3.2, DEA determined that the required collection over the three year FY 2012 – FY 2014 period must be \$1,041,258,818. To determine the registration fees, the number of registration fee transactions by business activity was estimated. Although related, the number of registration fee transactions is different from the registrant population for three primary reasons. One, registrants on a three year registration cycle have only one registration fee transaction every three years. Registration renewal dates are staggered across a three year period to generate

registration fee transactions from roughly one-third of these registrants each year. Two, a registrant may have multiple registrations, paying multiple fees. Three, approximately seven percent of the registrant population is exempt from paying registration fees.

Based on historical data, the table below summarizes the estimated number of registration fee transactions for FY 2012 – FY 2014. See [Appendix 3: Estimated Number of Registration Fee Transactions](#) for details on how the estimate was derived.

	Group	Business Activity	2012	2013	2014	Total
3 year registration	A	Pharmacy	25,270	22,823	25,367	73,460
	B	Hospital/Clinic	4,457	4,553	4,512	13,522
	C	Practitioner	376,768	367,226	382,387	1,126,381
	D	Teaching Institution	81	68	65	214
	M	Mid-level Practitioner (MLP)	72,978	75,076	84,448	232,502
1 year registration	E	Manufacturer	521	517	510	1,548
	F	Distributor	773	778	782	2,333
	G	Researcher/Canine Handler	4,143	4,255	4,373	12,771
	H	Analytical Lab	868	868	868	2,604
	J	Importer	213	217	220	650
	K	Exporter	248	249	250	747
	L	Reverse Distributor	66	67	68	201
	N	Maintenance	171	174	177	522
	P	Detoxification	81	80	79	240
	R	Maintenance & Detox	912	928	943	2,783
	S	Compounder/Maintenance	4	4	4	12
	T	Compounder/Detoxification	1	1	1	3
	U	Compounder/Maintenance/Detox	59	59	59	177
	W	Chemical Manufacturer	191	167	148	506
	X	Chemical Importer	200	201	202	603
	Y	Chemical Distributor	480	414	364	1,258
Z	Chemical Exporter	169	173	177	519	
	Total		488,654	478,898	506,004	1,473,556

Groups A, B, C, D, and M renew their registration every three years. The remaining groups renew annually. The 1,473,556 registrations over the three year period will need to result in collections of \$1,041,258,818.

3.4 Registration Fees by Business Activity

The registration fees are based on:

1. The amount that needs to be collected (determined in Section 3.2).
2. The number of transactions/registration fee transactions (determined in Section 3.3).
3. The share of cost burden (relative fees) across various registrant groups.

DEA examined four options as outlined in the NPRM and selected the “weighted-ratio” approach to set varying fees across registrant groups. A discussion of the other options is beyond the scope of this document.

As in previous fee schedules, the fees for distributors, importers, and exporters are 6.25 times the fees for retail level registrants and manufacturer fees are two times the fees for distributors. The table below describes the relative difference among the groups:

Group	Business Activity	Ratio
A	Pharmacy	3.00
B	Hospital/Clinic	3.00
C	Practitioner	3.00
D	Teaching Institution	3.00
M	Mid-level Practitioner (MLP)	3.00
E	Manufacturer	12.50
F	Distributor	6.25
G	Researcher/Canine Handler	1.00
H	Analytical Lab	1.00
J	Importer	6.25
K	Exporter	6.25
L	Reverse Distributor	6.25
N	Maintenance	12.50
P	Detoxification	1.00
R	Maintenance & Detox	1.00
S	Compounder/Maintenance	1.00
T	Compounder/Detoxification	1.00
U	Compounder/Maintenance/Detox	1.00
W	Chemical Manufacturer	12.50
X	Chemical Importer	6.25
Y	Chemical Distributor	6.25
Z	Chemical Exporter	6.25

Fees for groups A, B, C, D, and M are three times the other retail level registrants: G, H, P, R, S, T, and U. Since these groups are on a three year renewal cycle, the annualized fee remains the same as for other retail level registrants.

The number of registration fee transactions in Section 3.3 can be simplified as below:

	Groups	Ratio	Registration Fee Transactions: FY12-FY14
Distributor	F,L,Y	6.25	3,792
Importer/Exporter	J,K,X,Z	6.25	2,519
Manufacturer	E,W	12.50	2,054
Retail, 1-yr	G,H,N,P,R,S,T,U	1.00	19,112
Retail, 3-yr	A,B,C,D,M	3.00	1,446,079
Total			1,473,556

For purposes of the fee calculation, collection of the new fee is assumed to begin March 1, 2012. Thus, fee collections in the first five months of FY 2012 will be at current fees. Therefore, of 488,654 estimated registration fee transactions in FY 2012, approximately five twelfths (5/12), or 203,606 transactions, are anticipated at the current fee, resulting in estimated collections of \$112,283,229 for the first five months in FY 2012 (October 1, 2011 to February 29, 2012.)

	Groups	Ratio	Registration Fee Transactions: FY12-FY14	Registration Fee Transactions: FY12	Current Fee	Registration Fee Transactions @ Current Fee	Collections @ Current Fees (1st 5 months of FY12)
Distributor	F,L,Y	6.25	3,792	1,319	\$ 1,147	550	\$ 630,372
Importer/Exporter	J,K,X,Z	6.25	2,519	830	\$ 1,147	346	\$ 396,671
Manufacturer	E,W	12.50	2,054	712	\$ 2,293	297	\$ 680,257
Retail, 1-yr	G,H,N,P,R,S,T,U	1.00	19,112	6,239	\$ 184	2,600	\$ 478,323
Retail, 3-yr	A,B,C,D,M	3.00	1,446,079	479,554	\$ 551	199,814	\$ 110,097,606
Total			1,473,556	488,654		203,606	\$ 112,283,229

* Numbers are rounded.

Subtracting collections at the current fee in the first five months of FY 2012 (\$112,283,229) from the total needed collections from registration fees for the total 3-year period (\$1,041,258,818), DEA estimates \$928,975,590 of registration fee collections are required for the remainder of the 3-year period (seven months in FY 2012 and all of FY 2013 and FY 2014). Therefore, registration fees of \$928,975,590 need to be collected from the remaining 1,269,950 (1,473,556 – 203,606) registration fee transactions at the new fee level.

After assigning the ratio as weights, the following algebraic expression is used to calculate the fees:

$$(6.25x * 3,242) + (6.25x * 2,173) + (12.50x * 1,757) + (1.00x * 16,512) + (3.00x * 1,246,265) = \$928,975,590$$

Solving for x, x = \$243.75 (Retail, 1-yr)

By applying the weights/ratio, the calculated fees are shown in the table below, rounded to the whole dollar.

Required Registration Collections: FY12-FY14					1,041,258,818		
Required Registration Collections @ New Fees: 2 yrs 7 mos					928,975,590		
	Groups	Ratio	Registration Fee Transactions: FY12-FY14	Registration Fee Transactions @ Current Fee	Registration Fee Transactions @	Calculated New Fee	Calculated New Fee Rounded
Distributor	F,L,Y	6.25	3,792	550	3,242	\$ 1,523.46	\$ 1,523.00
Importer/Exporter	J,K,X,Z	6.25	2,519	346	2,173	\$ 1,523.46	\$ 1,523.00
Manufacturer	E,W	12.50	2,054	297	1,757	\$ 3,046.92	\$ 3,047.00
Retail, 1-yr	G,H,N,P,R,S,T,U	1.00	19,112	2,600	16,512	\$ 243.75	\$ 244.00
Retail, 3-yr	A,B,C,D,M	3.00	1,446,079	199,814	1,246,265	\$ 731.26	\$ 731.00
Total			1,473,556	203,606	1,269,950		

* Numbers are rounded.

3.5 Estimated Collections from Registration Fees

Due to rounding, the registration fees will not generate exactly \$1,041,258,818. The estimated collections based on the first five months of FY 2012 at current fees and the remainder of the 3-year period at the new fees, are \$1,040,934,380. The table below summarizes the estimated collections for the three years, FY 2012 – FY 2014.

	FY2012	FY2013	FY2014	Total (3-yr)
Collections from Registration Fees	320,835,793	350,219,287	369,879,300	1,040,934,380
CMEA Self-Cert Collections	105,000	105,000	105,000	315,000
Total Collections	320,940,793	350,324,287	369,984,300	1,041,249,380

4 Summary of Results

The table below summarizes the fee and resulting cash flow:

Group	Business	Current Fee	Ratio	New Fee
A	Pharmacy	551	3	731
B	Hospital/Clinic	551	3	731
C	Practitioner	551	3	731
D	Teaching Institution	551	3	731
M	Mid-level Practitioner (MLP)	551	3	731
E	Manufacturer	2,293	12.5	3,047
F	Distributor	1,147	6.25	1,523
G	Researcher/Canine Handler	184	1	244
H	Analytical Lab	184	1	244
J	Importer	1,147	6.25	1,523
K	Exporter	1,147	6.25	1,523
L	Reverse Distributor	1,147	6.25	1,523
N	Maintenance	184	1	244
P	Detoxification	184	1	244
R	Maintenance & Detox	184	1	244
S	Compounder/Maintenance	184	1	244
T	Compounder/Detoxification	184	1	244
U	Compounder/Maintenance/Detox	184	1	244
W	Chemical Manufacturer	2,293	12.5	3,047
X	Chemical Importer	1,147	6.25	1,523
Y	Chemical Distributor	1,147	6.25	1,523
Z	Chemical Exporter	1,147	6.25	1,523

	FY2012	FY2013	FY2014
Congressional Budget	322,000,000	352,563,000	364,895,000
Operational Continuity Fund (OCF)			
Brought Forward From Prior Year	41,726,554	39,701,112	36,496,165
Collections: Registration Fees	320,835,793	350,219,287	369,879,300
Collections: CMEA	105,000	105,000	105,000
Treasury	<u>(15,000,000)</u>	<u>(15,000,000)</u>	<u>(15,000,000)</u>
Net Collections	305,940,793	335,324,287	354,984,300
Recoveries from Deobligations	13,500,000	13,500,000	13,500,000
Other Collections	<u>533,766</u>	<u>533,766</u>	<u>533,766</u>
Subtotal Availability	361,701,112	389,059,165	405,514,231

New Registrant Fee Schedule Calculations

Obligations	322,000,000	352,563,000	364,895,000
EOY OCF Balance	39,701,112	36,496,165	40,619,231
Target OCF (\$15M+7% of Budget)	39,679,410	40,542,650	40,943,670

Numbers are rounded.

*For purposes of the fee calculation, the Congressional Budget and Obligations are treated as the same.

5 Factors that Can Influence Actual Results

All assumptions, inputs, and calculations contained in this document are for the purposes of calculating the fee only. Many procedural, operational, and economic variables can cause the actual results to differ from estimates and projections contained in this document.

Factors include (but are not limited to):

Delay in New Fee Effective Date	Estimates are based on the new fee schedule being effective and collections beginning on March 1, 2012. Any delay will have a large impact on the registration fees collected. Additionally, projected spending will also be impacted as operations are adjusted to meet financial constraints.
Change in Fee	Collections and budget estimates are based on the calculated fees. Any change in the amount will have a large impact on the registration fees collected. Additionally, projected spending will also be impacted as operations are adjusted to meet financial constraints.
New Legislative/Regulatory Mandate	A new legislative/regulatory mandate can require more spending and greatly impact cash flow.
Changes in Technology	New technology can be leveraged to improve efficiency and effectiveness within the Diversion Control Program. Technology can also be exploited by criminal groups to illegally divert controlled substances or listed chemicals.
Change in Staffing Level or Mix	Staffing increases account for the majority of budget increases. Changes in diversion trends may require DEA to change the level or mix (mix of job categories) in staffing, which would impact spending.
Change in Registrant Population	The registration fee collection projection assumes a certain level of new registrants and renewals. The actual number of registrations will impact collections from registrant fees and cash flow.
Change in Adjustments to Base (ATBs)	1.53 percent is assumed for ATBs to account for an annual inflation in DEA costs in estimating the FY 2014 budget. Actual inflation and ATB different from this assumed value can impact expenditures and cash flow. Depending on the severity, operational adjustments may be required.

Appendix 1: List of Acronyms

Acronym	Definition
AT	Attorney
CAGR	Compound Annual Growth Rate
CH	Forensic Chemist
CMEA	Combat Methamphetamine Epidemic Act of 2005
CON	Tactical Diversion Squad Contractor
CSA	Controlled Substances Act
DCFA	Diversion Control Fee Account
DCP	Diversion Control Program
DEA	Drug Enforcement Administration
DI	Diversion Investigator
DOJ	Department of Justice
EOY	End of Year
FR	DEA Office of Resource Management
FY	Fiscal Year
GS	General Schedule
IA	Intel Analyst
IT	Investigative Technology Specialist
LEAP	Law Enforcement Availability Pay
MET	Mobile Enforcement Team
MLP	Mid-level Practitioner
OCF	Operational Continuity Fund
OF	Other Federal
OT	Overtime
PA	Professional/Administrative
PE/PI	Purchase of Evidence/Purchase of Information
SA	Special Agent
PCS	Permanent Change of Station
SL	State & Local
TC	Technical/Clerical
TDS	Tactical Diversion Squad
TFO	Task Force Officer

Appendix 2: Target Operational Continuity Fund

Unlike appropriated funds where approved budgets are assured by law, DEA collects registration fees, which are subject to fluctuations and uncertainty, to fund the activities of the DCP. DEA maintains an operational continuity fund (OCF)⁴ based on the need to maintain DCP operations during historically low (or negative) collection periods.

Specifically, the OCF serves two purposes:

1. To have sufficient funds at the beginning of the fiscal year to fund operations while the first \$15 million in collections are paid to the Treasury.
2. To have sufficient funds to prevent fluctuations in collections from adversely affecting operations. (Without OCF, periods of lower than expected collection would require adjustment in operation/spending to prevent a negative balance.)

Since the \$15 million is a constant amount specified in law that is needed at the beginning of each year, \$15 million would be enough to satisfy purpose one above.

To determine the OCF needed to satisfy purpose two above, historical collections and obligations were examined. Tables below summarize the monthly collections and obligations as a percent of the total:

Cumulative Net Obligations as % of Total Obligations												
	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep
FY2004	9.27%	16.66%	20.62%	32.55%	38.64%	46.31%	53.56%	61.09%	69.62%	78.38%	88.06%	100.00%
FY2005	7.34%	12.76%	21.52%	28.83%	35.27%	45.84%	55.88%	64.38%	70.87%	83.04%	85.59%	100.00%
FY2006	8.51%	14.36%	25.49%	32.69%	42.17%	51.27%	59.73%	66.95%	74.02%	83.88%	92.71%	100.00%
FY2007	4.80%	12.57%	19.33%	25.62%	33.26%	42.87%	53.48%	60.53%	65.62%	72.54%	90.36%	100.00%
FY2008	4.91%	11.42%	16.30%	22.65%	29.62%	42.19%	48.32%	55.14%	74.84%	83.52%	92.21%	100.00%
FY2009	7.14%	12.34%	22.38%	28.94%	35.51%	41.10%	48.14%	58.73%	69.01%	77.34%	87.77%	100.00%
FY2010	5.02%	10.70%	19.24%	25.22%	33.48%	40.59%	51.85%	59.65%	72.99%	83.62%	89.23%	100.00%
Average	6.71%	12.97%	20.70%	28.07%	35.42%	44.31%	52.99%	60.92%	71.00%	80.33%	89.42%	100.00%
Minimum	4.80%	10.70%	16.30%	22.65%	29.62%	40.59%	48.14%	55.14%	65.62%	72.54%	85.59%	100.00%
Maximum	9.27%	16.66%	25.49%	32.69%	42.17%	51.27%	59.73%	66.95%	74.84%	83.88%	92.71%	100.00%
<i>(Net Obligations = Obligations - Recoveries from Deobligation)</i>												
Cumulative Gross Collections as % of Total Gross Collections												
	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep
FY04	2.12%	7.23%	14.90%	23.49%	31.96%	41.51%	49.01%	58.16%	71.19%	79.99%	91.20%	100.00%
FY05	4.77%	12.92%	21.51%	30.56%	37.89%	47.78%	55.43%	63.90%	72.82%	81.38%	90.80%	100.00%
FY06	6.01%	13.00%	20.49%	31.39%	40.71%	48.92%	56.72%	65.33%	74.54%	82.58%	91.90%	100.00%
FY07	4.90%	9.71%	16.75%	28.23%	37.64%	46.15%	54.02%	64.19%	73.10%	82.32%	91.71%	100.00%
FY08	6.48%	12.51%	21.67%	31.53%	40.52%	48.44%	56.17%	64.22%	72.90%	82.00%	91.09%	100.00%
FY09	6.84%	13.39%	19.32%	29.42%	39.87%	48.39%	55.76%	64.87%	73.97%	82.92%	91.26%	100.00%
FY10	6.10%	12.77%	20.55%	29.89%	38.96%	47.23%	55.77%	65.13%	73.89%	82.29%	91.36%	100.00%
Average	5.32%	11.65%	19.31%	29.22%	38.22%	46.92%	54.70%	63.68%	73.20%	81.92%	91.33%	100.00%
Minimum	2.12%	7.23%	14.90%	23.49%	31.96%	41.51%	49.01%	58.16%	71.19%	79.99%	90.80%	100.00%
Maximum	6.84%	13.39%	21.67%	31.53%	40.71%	48.92%	56.72%	65.33%	74.54%	82.92%	91.90%	100.00%
<i>(Gross Collections = Registration Fees + Other Collections (sale of vehicles) + CMEA Self-certification Collections)</i>												

⁴ Often called “working capital” in industry, DEA avoids using this term to not cause confusion between OCF and a specific account “Working Capital Fund” maintained by DOJ.

The tables show that there are times where obligations exceed collections. For example, in November FY 2004, cumulative obligations exceeded collections by 9.4 percent, or the cumulative balance (collections minus obligations) was -9.4 percent. This was an unusual year and operational adjustments were made to ensure DEA did not spend beyond funds that were available.

Therefore, OCF needs to be sufficient to cover the maximum difference between cumulative obligations and cumulative collections at any given month in the year.

Model historical data as a triangular probability distribution,⁵ for example, in the month of November:

- Cumulative Obligation
 - Maximum: 16.66%
 - Minimum: 10.70%
 - Average/Mode: 12.97%.
- Cumulative Collection
 - Maximum: 13.39%
 - Minimum: 7.23%
 - Average/Mode: 11.65%

In a given year, there may have been instances where spending was altered due to low collections. Since the purpose of the OCF is to prevent adjusting operations/spending as a result of low collections, collections and obligations are modeled independently to prevent this relationship from influencing the model.

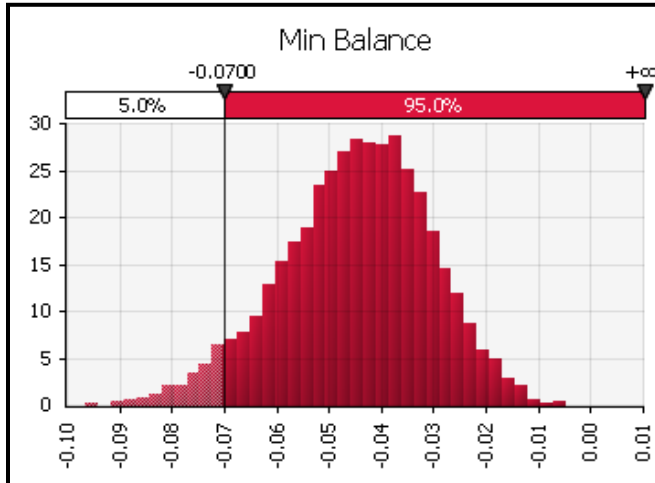
Using Monte-Carlo⁶ simulation (10,000 iterations), the maximum negative minimum balance (cumulative collections minus obligations) was determined. The table below shows an example of one iteration. The minimum balance is -3.61 percent in April.

	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep
Collections	4.25%	12.36%	21.03%	31.20%	37.33%	45.28%	51.66%	59.26%	73.75%	81.97%	91.31%	100.00%
Obligations	5.90%	13.49%	21.49%	28.10%	32.76%	41.61%	55.27%	60.14%	71.54%	76.62%	89.58%	100.00%
Collections-Obligations	-1.65%	-1.13%	-0.46%	3.09%	4.57%	3.67%	-3.61%	-0.89%	2.21%	5.35%	1.73%	0.00%
Min Balance	-3.61%											

⁵ Triangular distribution in this example means that future cumulative collections in November will be at a minimum 7.23 percent, a maximum 13.39 percent, and most likely 11.65 percent.

⁶ Monte Carlo simulation (named after Monte Carlo, Monaco, where games of chance are a popular attraction) is an iterative method where variables are randomly varied according to the assumed probability distribution. Aided by a computer, numerous iterations (10,000 in this case) result in numerous outcomes. The results define the probability of different outcomes occurring.

Results of the 10,000 iterations are summarized by the below probability density function.



Summary Statistics for Min Balance	
Minimum	-9.64%
Maximum	0.00%
Mean	-4.47%
Std Dev	1.41%

The results indicate that of the 10,000 iterations the lowest minimum balance is -9.64 percent, the highest minimum balance is 0.00 percent and on average the minimum balance is -4.47 percent. Also, 95 percent of the outcomes are above -7.00 percent, which means that only five percent of the time the cumulative obligations were more than seven percent of cumulative collections. Alternatively, having a seven percent OCF has a 95 percent likelihood of being enough to fund DCP operations without operational adjustments as a result of fluctuations and differences between collections and obligations.

DEA has decided that the five percent risk of having to adjust operations as a result of month-to-month fluctuations/differences in collections and obligations is a tolerable risk. Therefore, a sufficient amount for purpose number two above is seven percent of planned obligations/budget.

Combining the two components of the OCF, the Target OCF Balance is \$15 million plus seven percent of planned obligations.

Appendix 3: Estimated Number of Registration Fee Transactions

The estimated number of registration fee transactions is a forecast based on a ten year history of registration fee transactions.

Below is a summary of the forecasted number of registrations. Groups A, B, C, D, and M are on three year registration cycles. Thus, the number of annual registration fee transactions is roughly one-third of the population of paying registrants.

	Group	Business Activity	2012	2013	2014	Total
3 year registration	A	Pharmacy	25,270	22,823	25,367	73,460
	B	Hospital/Clinic	4,457	4,553	4,512	13,522
	C	Practitioner	376,768	367,226	382,387	1,126,381
	D	Teaching Institution	81	68	65	214
	M	Mid-level Practitioner (MLP)	72,978	75,076	84,448	232,502
1 year registration	E	Manufacturer	521	517	510	1,548
	F	Distributor	773	778	782	2,333
	G	Researcher/Canine Handler	4,143	4,255	4,373	12,771
	H	Analytical Lab	868	868	868	2,604
	J	Importer	213	217	220	650
	K	Exporter	248	249	250	747
	L	Reverse Distributor	66	67	68	201
	N	Maintenance	171	174	177	522
	P	Detoxification	81	80	79	240
	R	Maintenance & Detox	912	928	943	2,783
	S	Compounder/Maintenance	4	4	4	12
	T	Compounder/Detoxification	1	1	1	3
	U	Compounder/Maintenance/Detox	59	59	59	177
	W	Chemical Manufacturer	191	167	148	506
	X	Chemical Importer	200	201	202	603
Y	Chemical Distributor	480	414	364	1,258	
Z	Chemical Exporter	169	173	177	519	
	Total		488,654	478,898	506,004	1,473,556

The forecasted number of registration fee transactions is based on the following mathematical expressions:

$$[\text{New Registration Fee Transactions}] + [\text{Registration Renewal Transactions}] = [\text{Total Registration Fee Transactions}]$$

Where,

[Registration Renewal Transactions] = [Total Registration Fee Transactions, previous period] x [Retention Rate]

And,

[Retention Rate] = average of historical (Registration Renewal Transactions divided by Total Registration Fee Transactions Previous Period)

“Previous Period” = 3 years for Business Activities on 3 year registrations, 1 year for Business Activities on 1 year registrations

The following steps were taken to generate the forecast (refer to the detailed table below):

1. Get historical data
 - a. Query historical numbers for [New Registration Fee Transactions] and [Registration Renewal Transactions] by Registrant Group (Business Activity) for each of the 10 years.
 - b. Sum the two numbers to get [Total Registration Fee Transactions]
 - c. Calculate [Retention Rate] for each year by dividing the [Registration Renewal Transactions] by [Total Registration Fee Transactions, previous period].
 - d. Calculate [Average Retention Rate]
2. Forecast [New Registration Fee Transactions] for FY 2012 to FY 2014
 - a. Examine FY 2001 to FY 2010 [New Registration Fee Transactions] for any discernible trends.
 - i. Examination of the historical number of new registrants showed that some registrant groups had a well-defined trend line (low scatter), while others did not (large scatter). Trend lines were used to project new registrants for registrant groups with well-defined trend lines, while an average was used for registrant groups with large scatter. Although a trend line can be mathematically generated on a registrant group with large scatter, the confidence level on the trend line would be low.
 - ii. Additionally, trend lines for some groups changed over time. For the registrant groups that did have a noticeable change in new registrants, a five year history is used to not skew the data with data prior to the fee increase. For the registrant groups that did not have a noticeable drop in new registrants, a ten year history is used.
 - b. If there is a discernible trend, linear regression⁷ is used to develop a trend line and forecast⁸ [New Registration Fee Transactions] for FY 2011 to FY 2014. If the use of trend line results in unrealistic values, then professional judgment is used.

⁷ Linear regression is a statistical approach used to calculate a straight line that best fits the data: historical number of new registration fee transactions by year. The calculated line is used to forecast the number of registration fee transactions for future years.

- c. If the trend is indiscernible, the average of FY 2001 to FY 2010 [New Registration Fee Transactions] is used to forecast [New Paying Registration] for FY 2011 to FY 2014.
 - d. Use five or ten years of data based on historical data examination in step 2.a.ii above. [New Registration Forecast Method] in the table below indicates whether five or ten year history was used and whether a trend line or average was used to forecast [New Paying Registration] for FY 2012 to FY 2014.
3. Forecast [Registration Renewal Transactions] for FY 2012 to FY 2014
 - a. Use [Average Retention Rate] as the [Retention Rate] for years FY 2012 to FY 2014.
 - b. Multiply [Total Registration Fee Transactions, previous period] by [Retention Rate] for [Registration Renewal Transactions]
 - i. For groups A, B, C, D, M (Three year registrations):
$$\begin{aligned} & [\text{Total Registration Fee Transactions, FY2009}] * [\text{Retention Rate, FY2012}] \\ & = [\text{Registration Renewal Transactions, FY2012}] \end{aligned}$$
 - ii. For all other groups (One year registrations):
$$\begin{aligned} & [\text{Total Registration Fee Transactions, FY2011}] * [\text{Retention Rate, FY2012}] \\ & = [\text{Registration Renewal Transactions, FY2012}] \end{aligned}$$
4. Forecast [Total Registration Fee Transactions] for FY 2012to FY 2014
 - a. Sum [New Registration Fee Transactions, FY2012] from step 2 and [Paying Renewal, FY2012] from step 3 for [Total Registration Fee Transactions, FY2012]
 - b. Repeat steps 3 and 4.a for FY 2013 and FY 2014 for [Total Registration Fee Transactions] for FY 2013 to FY 2014.

⁸ Used “FORECAST” function in MS Excel. From Microsoft Office Excel 2007 Help: “(FORECAST function) Calculates, or predicts, a future value by using existing values. The predicted value is a y-value for a given x-value. The known values are existing x-values and y-values, and the new value is predicted by using linear regression. You can use this function to predict future sales, inventory requirements, or consumer trends.”

Group		2002	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	Average Renewal Rate	New Registration forecast method
		A	New Registration Fee Transactions	4044	4251	3922	4246	4058	3628	3710	4217	3,249	3,260	3,371	3,282	3,193
	Registration Renewal Transactions	18567	17862	13982	19362	18147	16336	20783	20490	18,798	21,758	21,899	19,541	22,174		
	Renewal Rate		79.3%	86.8%	85.6%	82.1%	91.2%	88.0%	92.3%	94.2%	88.8%	88.6%	88.6%	88.6%		
	Total Registration Fee Transactions	22611	22113	17904	23608	22205	19964	24493	24707	22047	25,018	25,270	22,823	25,367		
B	New Registration Fee Transactions	851	1158	1169	1073	1087	932	934	838	879	794	972	972	972	81.8%	10-yr ave
	Registration Renewal Transactions	2809	2748	2947	3041	3194	3298	3369	3421	3,498	3,532	3,485	3,581	3,540		
	Renewal Rate		83.9%	83.0%	83.1%	81.8%	80.1%	81.9%	79.9%	82.7%	82.1%	81.8%	81.8%	81.8%		
	Total Registration Fee Transactions	3660	3906	4116	4114	4281	4230	4303	4259	4377	4,326	4,457	4,553	4,512		
C	New Registration Fee Transactions	39300	44238	41635	41596	41921	40805	44209	45525	46,588	48,904	47,774	48,556	49,338	92.6%	10-yr trend
	Registration Renewal Transactions	261141	261625	262698	275216	282010	282560	294554	309873	297,658	310,875	328,994	318,670	333,049		
	Renewal Rate		91.9%	91.5%	91.6%	92.2%	92.8%	93.0%	95.7%	92.1%	91.8%	92.6%	92.6%	92.6%		
	Total Registration Fee Transactions	300441	305863	304333	316812	323931	323365	338763	355398	344246	359,779	376,768	367,226	382,387		
D	New Registration Fee Transactions	15	39	38	36	43	49	33	27	34	37	35	35	35	53.0%	10-yr ave
	Registration Renewal Transactions	31	63	20	32	61	35	34	59	28	20	46	33	30		
	Renewal Rate		71.6%	64.5%	69.6%	59.8%	60.3%	50.0%	56.7%	33.3%	29.9%	53.0%	53.0%	53.0%		
	Total Registration Fee Transactions	46	102	58	68	104	84	67	86	62	57	81	68	65		
M	New Registration Fee Transactions	12136	14279	13803	14406	16346	15431	17292	17830	18,484	21,224	21,886	23,163	24,441	89.3%	5-yr trend
	Registration Renewal Transactions	12438	15925	18226	21047	27664	29422	34072	39389	39,654	45,978	51,092	51,913	60,007		
	Renewal Rate		78.8%	81.7%	85.6%	91.6%	91.9%	96.1%	89.5%	88.4%	89.5%	89.3%	89.3%	89.3%		
	Total Registration Fee Transactions	24574	30204	32029	35453	44010	44853	51364	57219	58138	67,202	72,978	75,076	84,448		
E	New Registration Fee Transactions	46	72	71	77	66	67	61	54	63	50	49	46	43	90.4%	5-yr trend
	Registration Renewal Transactions	313	329	347	438	442	444	448	402	460	472	472	471	467		
	Renewal Rate	89.9%	91.6%	86.5%	104.8%	85.8%	87.4%	87.7%	79.0%	100.9%	90.2%	90.4%	90.4%	90.4%		
	Total Registration Fee Transactions	359	401	418	515	508	511	509	456	523	522	521	517	510		
F	New Registration Fee Transactions	139	132	127	153	139	113	94	82	70	132	118	118	118	85.4%	10-yr ave
	Registration Renewal Transactions	536	535	563	672	652	638	639	600	630	635	655	660	664		
	Renewal Rate	83.1%	79.3%	84.4%	97.4%	79.0%	80.7%	85.1%	81.9%	92.4%	90.7%	85.4%	85.4%	85.4%		
	Total Registration Fee Transactions	675	667	690	825	791	751	733	682	700	767	773	778	782		
G	New Registration Fee Transactions	442	544	493	583	555	581	677	585	704	627	698	719	741	85.4%	10-yr trend
	Registration Renewal Transactions	2737	2706	2753	2790	2828	2846	2918	2817	3,243	3,409	3,445	3,536	3,632		
	Renewal Rate	84.6%	85.1%	84.7%	86.0%	83.8%	84.1%	85.1%	78.4%	95.3%	86.4%	85.4%	85.4%	85.4%		
	Total Registration Fee Transactions	3179	3250	3246	3373	3383	3427	3595	3402	3947	4,036	4,143	4,255	4,373		
H	New Registration Fee Transactions	74	98	105	90	95	87	80	103	110	113	96	96	96	88.9%	10-yr ave
	Registration Renewal Transactions	759	737	719	731	729	737	740	661	801	755	772	772	772		
	Renewal Rate	89.8%	88.5%	86.1%	88.7%	88.8%	89.4%	89.8%	80.6%	104.8%	82.9%	88.9%	88.9%	88.9%		
	Total Registration Fee Transactions	833	835	824	821	824	824	820	764	911	868	868	868	868		
J	New Registration Fee Transactions	21	32	38	34	40	33	28	36	31	24	32	32	32	86.8%	10-yr ave
	Registration Renewal Transactions	118	121	130	142	146	152	157	148	175	185	181	185	188		
	Renewal Rate	96.7%	87.1%	85.0%	84.5%	83.0%	81.7%	84.9%	80.0%	95.1%	89.8%	86.8%	86.8%	86.8%		
	Total Registration Fee Transactions	139	153	168	176	186	185	185	184	206	209	213	217	220		
K	New Registration Fee Transactions	28	30	27	56	33	29	36	27	31	34	33	33	33	87.1%	10-yr ave
	Registration Renewal Transactions	179	192	192	185	192	200	197	190	211	213	215	216	217		
	Renewal Rate	86.1%	92.8%	86.5%	84.5%	79.7%	88.9%	86.0%	81.5%	97.2%	88.0%	87.1%	87.1%	87.1%		
	Total Registration Fee Transactions	207	222	219	241	225	229	233	217	242	247	248	249	250		

(Continued on next page)

New Registrant Fee Schedule Calculations

(Continued from previous page)

Group		2002	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	Average Renewal Rate	New Registration forecast method
		L	New Registration Fee Transactions	1	5	6	4	13	7	10	19	14	12	9	9	9
	Registration Renewal Transactions	33	36	40	39	38	37	38	36	49	52	57	58	59		
	Renewal Rate	103.1%	105.9%	97.6%	84.8%	88.4%	72.5%	86.4%	75.0%	89.1%	82.5%	88.5%	88.5%	88.5%		
	Total Registration Fee Transactions	34	41	46	43	51	44	48	55	63	64	66	67	68		
N	New Registration Fee Transactions	15	21	24	35	26	48	15	25	20	22	25	25	25	87.1%	10-yr ave
	Registration Renewal Transactions	91	90	105	104	110	114	128	128	154	146	146	149	152		
	Renewal Rate	94.8%	84.9%	94.6%	80.6%	79.1%	83.8%	79.0%	89.5%	100.7%	83.9%	87.1%	87.1%	87.1%		
	Total Registration Fee Transactions	106	111	129	139	136	162	143	153	174	168	171	174	177		
P	New Registration Fee Transactions	12	10	20	16	9	10	5	8	12	10	11	11	11	85.1%	10-yr ave
	Registration Renewal Transactions	98	97	84	81	76	76	72	66	66	72	70	69	68		
	Renewal Rate	87.5%	88.2%	78.5%	77.9%	78.4%	89.4%	83.7%	85.7%	89.2%	92.3%	85.1%	85.1%	85.1%		
	Total Registration Fee Transactions	110	107	104	97	85	86	77	74	78	82	81	80	79		
R	New Registration Fee Transactions	65	56	80	98	101	88	69	63	57	75	75	75	75	93.5%	10-yr ave
	Registration Renewal Transactions	598	624	654	666	697	709	744	677	789	820	837	853	868		
	Renewal Rate	93.7%	94.1%	96.2%	90.7%	91.2%	88.8%	93.4%	83.3%	106.6%	96.9%	93.5%	93.5%	93.5%		
	Total Registration Fee Transactions	663	680	734	764	798	797	813	740	846	895	912	928	943		
S	New Registration Fee Transactions	0	0	0	6	1	0	1	0	-	-	1	1	1	87.3%	10-yr ave
	Registration Renewal Transactions	5	5	5	5	7	8	5	5	5	4	3	3	3		
	Renewal Rate	83.3%	100.0%	100.0%	100.0%	63.6%	100.0%	62.5%	83.3%	100.0%	80.0%	87.3%	87.3%	87.3%		
	Total Registration Fee Transactions	5	5	5	11	8	8	6	5	5	4	4	4	4		
T	New Registration Fee Transactions	0	1	0	0	1	1	0	1	-	-	-	-	-	67.9%	10-yr ave
	Registration Renewal Transactions	4	3	2	1	1	1	1	0	1	1	1	1	1		
	Renewal Rate	100.0%	75.0%	50.0%	50.0%		50.0%	50.0%			100.0%	67.9%	67.9%	67.9%		
	Total Registration Fee Transactions	4	4	2	1	2	2	1	1	1	1	1	1	1		
U	New Registration Fee Transactions	2	4	4	5	12	5	3	4	4	8	5	5	5	91.1%	10-yr ave
	Registration Renewal Transactions	64	61	60	60	61	50	52	47	48	51	54	54	54		
	Renewal Rate	98.5%	92.4%	92.3%	93.8%	93.8%	68.5%	94.5%	85.5%	94.1%	98.1%	91.1%	91.1%	91.1%		
	Total Registration Fee Transactions	66	65	64	65	73	55	55	51	52	59	59	59	59		
W	New Registration Fee Transactions	34	45	48	50	23	63	50	41	36	24	15	10	10	82.5%	Stabilize @ 15, 10, 10
	Registration Renewal Transactions	162	171	182	181	185	149	145	143	183	190	176	157	138		
	Renewal Rate	94.7%	87.2%	84.3%	78.7%	80.1%	71.6%	68.4%	73.3%	99.5%	86.8%	82.5%	82.5%	82.5%		
	Total Registration Fee Transactions	196	216	230	231	208	212	195	184	219	214	191	167	148		
X	New Registration Fee Transactions	56	40	40	42	26	40	33	35	26	33	37	37	37	82.2%	10-yr ave
	Registration Renewal Transactions	126	135	149	155	154	130	134	120	156	165	163	164	165		
	Renewal Rate	88.1%	74.2%	85.1%	82.0%	78.2%	72.2%	78.8%	71.9%	100.6%	90.7%	82.2%	82.2%	82.2%		
	Total Registration Fee Transactions	182	175	189	197	180	170	167	155	182	198	200	201	202		
Y	New Registration Fee Transactions	275	440	396	266	136	181	140	105	50	64	50	50	50	75.8%	Stabilize @ 50, 50, 50
	Registration Renewal Transactions	2099	2098	2029	1944	1662	872	673	565	559	503	430	364	314		
	Renewal Rate	85.9%	88.4%	79.9%	80.2%	75.2%	48.5%	63.9%	69.5%	83.4%	82.6%	75.8%	75.8%	75.8%		
	Total Registration Fee Transactions	2374	2538	2425	2210	1798	1053	813	670	609	567	480	414	364		
Z	New Registration Fee Transactions	37	33	26	41	17	50	20	12	16	17	27	27	27	86.5%	10-yr ave
	Registration Renewal Transactions	126	135	149	157	151	134	128	111	153	147	142	146	150		
	Renewal Rate	92.0%	82.8%	88.7%	89.7%	76.3%	79.8%	69.6%	75.0%	124.4%	87.0%	86.5%	86.5%	86.5%		
	Total Registration Fee Transactions	163	168	175	198	168	184	148	123	169	164	169	173	177		
Sum of New Registration Fee Transactions		57,593	65,528	62,072	62,913	64,748	62,248	67,500	69,637	70,478	75,464	75,319	77,302	79,292		
Sum of Registration Renewal Transactions		303,034	306,298	306,036	327,049	339,207	338,948	360,031	379,948	367,319	389,983	413,335	401,596	426,712		
Sum of Total Registration Fee Transactions		360,627	371,826	368,108	389,962	403,955	401,196	427,531	449,585	437,797	465,447	488,654	478,898	506,004		