



# **COMMONWEALTH of VIRGINIA**

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## **MEMORANDUM**

**To:** Robert T. Hasler, Jr., President  
Board for Branch Pilots  
  
Mark N. Courtney, Executive Director  
Board for Branch Pilots

**From:** Cynthia H. Norwood  
Assistant Attorney General

**Date:** December 14, 2006

**Subject:** Letter of Assurance for Fast-Track Amendments to Board for  
Branch Pilots Regulations Relating to Licensing Fees

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I have reviewed the Fast-Track amendments to the Board for Branch Pilots regulations that were posted on the Virginia Regulatory Town Hall internet site on December 14, 2006. In my view, as counsel to the Board for Branch Pilots, the Board may promulgate these regulations pursuant to § 54.1-902 of the *Code of Virginia*. The proposed amendments to Regulations 18 VAC 45-20-10 and 18 VAC 45-20-20 do not appear to conflict with the Constitution of the United States or the Constitution of the Commonwealth of Virginia, nor do they appear to conflict with any federal or state law currently in effect.

This memorandum addresses legal matters only and is not intended to serve, nor should it be construed, as a comment for or against the merits of the proposed regulations.