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August 16, 2018

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Dear Sirs:

It has come to my attention that my August 14 submission contains a couple of minor errors and an omission.

The calculation “0.033% in Comment 3 should be --0.33%--. The remaining percentages stated in Comment 3 reflect percentages possibly to be realized during the first year of the proposed fee-and-CLE program.

**Comment 5h: What will it cost to offer CLE?**

Please advise whether the Office intends to charge companies, law firms, and others for the privilege of offering CLE programs, as is common in state bar programs. If so, what will those fees be, and how will they be calculated? Will the Office charge fees to become an accredited provider, or on a course-by-course basis, or both? Will the Office require attendance fees, and submission of reports for each CLE offering, as some states require?

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In my home state, it is quite expensive and laborious to become an Accredited Provider of CLE. Illinois requires a hefty annual fee, and requires submission of a detailed report for each and every CLE session. We then must pay fees for each Illinois attorney attendee. There are also late fees for failure to submit timely reports.

In fact, the current Illinois fee schedule<sup>1</sup> contains no fewer than 35 separate types of fees and charges for CLE providers. Illinois also imposes detailed recordkeeping requirements, and instructs that CLE providers retain attendance records of all CLE programs for years. Since we offer CLE courses with regularity, we have one employee position dedicated in part to CLE compliance paperwork.

Does the Office intend to emulate the Illinois system? Will we be required to navigate through 35 types of fees to become an accredited provider, and will we be required to increase our CLE compliance staff? What other fees or paperwork requirements will the Office impose on CLE providers?

If the Office does intend to impose any such fees or paperwork requirements, please provide the details. Also, please add any such fees and associated transactional costs to the calculation of the paperwork burden.

Thank you for considering these supplemental comments.

/ Allen Hoover/

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<sup>1</sup> The schedule is available at the following link as of today's date:  
<https://www.mcleboard.org/mcldedevDownload/ProviderPDFs/RevisedFeeSchedule20150701.pdf>