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Proposed Continuing Legal Education Guidelines

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Submitter Information

Name: Anonymous Anonymous

General Comment

The PTO should not get into the business of "approving" and "disapproving" CLE. Different patent attorneys need to know different stuff, not all of which involves practice at the PTO per se. Picking winners and losers will require significant administrative machinery at the PTO, which the PTO has no past expertise, and for which the PTO has indicated it's only willing to pay for by shifting costs to attorneys. Also, patent agents have no existing CLE requirement. The PTO doesn't recognize what the costs are, let alone fairly estimate them as required by the Paperwork Reduction Act. Often, treatment of patent agents at a state level varies from that at the federal level.