

From: [Robin Hunziker](#)
To: [CLEguidelines](#)
Subject: Docket No. PTO-P-2020-0042 - Proposed CLE Guidelines
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This is in response to the USPTO's request for comments in Docket No. PTO-P-2020-0042 regarding proposed CLE Guidelines. I am a registered patent attorney. The following are my personal comments. The comments below may not reflect the views of my employer.

Regarding question 6, please work with the Continuing Legal Education Regulators Association (CLEreg) to develop and maintain a standard electronic format that can be used by reporting entities. Preferably IP would be an additional specialty credit as recognized by CLEreg. For example, a reporting entity should be able to submit to any CLE regulatory entity an XML document that complies with an XSD profile approved by CLEreg. In that manner, a CLE sponsor could submit one XML document re attendees to the USPTO as well as other CLE regulators. Such a document could then be efficiently processed by the USPTO and also not require further intervention by individual practitioners.

Regarding questions 1-3, please realize that many in-house patent attorneys also work on many other issues. Accordingly, effective portfolio management and licensing is as important as prosecution and should qualify as course topics. Protection via copyright and trade secret should also qualify as course topics. MPEP should not be considered as authoritative or a required component. Any ethics CLE should qualify for the ethics requirement. Regarding question 4, any provider - not just the USPTO - should be authorized to deliver USPTO CLE courses. Regarding question 5, there should be no need for individual certification if the USPTO receives adequate documentation of compliance as set forth above.