

**From:** Ron Harris  
**To:** [Fee.Setting](#)  
**Subject:** Please withdraw proposed practitioner rules  
**Date:** Monday, August 5, 2019 10:39:54 PM

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Dear Commissioner:

I respectfully oppose the proposed new fees on at least the following grounds:

- (1) As a new fee, the newly proposed practitioner fee (and rules) likely must be implemented, if at all, only after issuing a Fed. Reg. notice under the APA.
- (2) Any proposed practitioner fees are a further tax on innovation, especially on smaller law firms that represent smaller entities.
- (3) Practitioner fees will simply be siphoned off to Treasury funds, further disincenting innovation by misallocating funds to revenue-losing and wholly unrelated drains.
- (4) New USPTO practitioner rules also seem to require unneeded CLE where state bar associations already provide ample training and updating requirements.

Thank you,  
Ron Harris

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