

**From:** Henry Wixon  
**To:** [Fee Setting](#)  
**Subject:** Proposed Practitioner Fee  
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As the manager of a federal government legal office which includes registered patent attorneys performing patent application services for agencies of the federal government, and a registered patent attorney myself, I request that the US Patent and Trademark Office (PTO) reconsider its proposed mandatory patent bar dues and its CLE requirements.

The proposed scheme would tax registered patent attorneys and agents, and appears to provide no more value to practitioners or the public than existing private-sector organizations, such as the American Intellectual Property Law Association (AIPLA).

As a member of AIPLA for over 30 years, I have taken advantage of that organization's continuing legal education offerings and participated in its committees. When I joined the government after over 20 years in the private sector, I was able to take advantage of reduced membership fees offered by AIPLA for government employees.

Today, I would suggest that pretty much every practicing patent attorney and agent follows legal and practice developments more closely than ever, through excellent patent-oriented blogs with which I am sure the PTO is familiar, and through CLE offered by AIPLA and others, as well as through the PTO's issued guidance. I cannot see even an incremental value to the practitioner or to the clients of practitioners from PTO-imposed CLE.

Under the PTO proposal, the registered patent attorneys in my office would be required to pay full PTO bar dues. This would be in addition to the state bar dues they are already obligated to pay as a requirement of their government positions. Such an additional expense and hardship should not be imposed by the PTO on public servants. The PTO's proposal would discourage, rather than promote, public service. At the very least, the PTO should provide for reduced fees for government employees.

Respectfully submitted

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