I am writing in response to the proposed yearly "bar" fee for Patent Agents and Attorneys with discount for CLE.

I understand the cost burden of the OED and the lack of assurance that all practicing practitioners maintain a sufficient understanding of the law to continue practicing. However, as a potential future Patent Agent, I am not required by another bar organization to take CLE to maintain my practice. All practicing Patent Attorney's will have CLE. Therefore, I would like to see a difference in the cost for Agent with CLE vs Attorney with CLE as the cost burden during the year is more for an Agent who has never needed CLE versus the Attorney where the CLE cost are a function of their license to practice.

There is another cost savings that does not seem to be addressed in this fee setting for OED, which is the automation of the initial request for testing and certification of patent practitioners. The archaic use of paper to be certified to take the Patent Bar is a burden in itself.

I would like to say that I support the push to include CLE for practitioners. But I feel that there should be some consideration for the difference between an Agent and an Attorney.

Thanks,
Megan Carlson