

September 11, 2018

Subject: Annual Fees for registration of Patent Practitioners

With respect, I am totally opposed to the charging of annual fees to maintain registration of patent practitioners and I respectfully request that this proposal be dropped permanently.

I make this request for the following reasons:

- 1) There has been no public discussion of annual reregistration of patent practitioners and no opportunity for comment
- 2) There is no precedent for this annual reregistration
- 3) The fees are quite large considering the minimal or no cost to the USPTO of the reregistration, particularly if it is done on-line. The fee can be a significant burden to a small private practitioner
- 4) I understand that the reason given for the large fees is to help defray the costs of disciplinary actions. With the current number of active registrations, I speculate that the annual revenue from the practitioner registration fees would be between \$3 million and possibly as much as \$10 million. This appears completely out of line with the tiny number of annual disciplinary actions.
- 5) So it appears that the only reason for the fees is increased revenue to the USPTO which, in current years, has been returned to the U.S.Treasury. Patent practitioners pay enough in taxes as it is and this "backdoor" method to enrich further the US Treasury is inappropriate.

I therefore request:

- a) Drop permanently the proposal for annual reregistration of practitioners with accompanying large fees
- b) Alternately, make the annual reregistration no charge or else a nominal charge, maximum \$25 per year.

Thank you very much for your consideration.

Sincerely,



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