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Sent: Friday, October 19, 2012 4:50 AM
To: Ethics Rules Comments
Subject: USPTO Ethics Rules Comments

Comments ethicsrules.comments@uspto.gov <ethicsrules.comments@uspto.gov>;
re: <http://www.uspto.gov/news/pr/2012/12-65.jsp> PR; 12-65
USPTO Proposes Updated Professional Conduct Rules
New rules will correspond to the ABA and most state bar requirements

"This proposed rule package adopts most ABA provisions wholesale or with minor revisions and codifies many professional responsibility obligations that already apply to the practice of law."

The adoption and codification of ABA guidelines in itself is ill-advised. This will by precedent place USPTO in subjection to ABA changes in the future, per se.

This entire push and proposal is unnecessary, and improper, and will ever abdicate the good faculties of decision regarding rules to a remote, external, quite ethically fallible, overruling entity (in effect, if not in fact), while any rule USPTO wishes to borrow for its own at any time and any changes it wishes to adopt autonomously with regard to these rules of conduct currently as it now enjoys, it may do so, or it may choose not to. The proposed redundancy and displacement of responsibility and authority is unnecessary and detrimental.

The ABA is a very bad keeper of its own house, and the unethical behavior in general litigation and prosecution, even jurisprudence is obvious and growing to infamous proportion. The USPTO is doing well as is, and rules changes should be considered always, on a rule by rule basis by legitimate internal authority, as is the historical structure of US government. This proposed idea is foreign to good government.

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