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Commissioner of Patents and Trademarks

Alexandria, VA 22313-1450

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

In re:

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37 CFR Part 1 [Docket No.: 2005-P-066]

RIN 0651-AB93

Changes To Practice for Continuing Applications, Requests for Continued Examination Practice, and Applications Containing Patentably Indistinct Claims

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COMMENTS ON THE ABOVE IDENTIFIED RULES CHANGE

I am an independent registered patent agent, working with a number of private clients who are large and small businesses and individual inventors.

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I oppose the proposed rules changes, on the grounds that they will increase my work, increase the amount that my clients will have to pay for my time, and increase the amount of bureaucracy that gums up the work of the PTO. The faults of the proposed rules are given in detail in the comments already received, and I will comment only that the rules will make it much more difficult to recover from errors in prosecution, both by the inventors and their agents and by the Examiners. From the language of the proposed rule, a simple petition will not suffice to continue "train wrecks" such as I have been forced to clean up after a naive inventor's collision with the office.

21

If the office thinks that the rules change will save them work, think again. The only ration strategy for the agent, is, upon final rejection, to file an appeal, rather than to continue the case as is the present strategy. Presently, the dialog between Applicant and Examiner is very valuable, and should not be terminated arbitrarily.

26

1/2 * RCVD AT 5/1/2006 12:05:17 PM [Eastern Daylight Time] * SVR:USPTO-EFXRF-6/33 * DNIS:2737735 * CSID:9147624126 * DURATION (mm-ss):00-42 1

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RODNEY T HODGSON

PAGE 02

1 On a more general note, I can only state that, had I a practical monopoly service business
 increasing at the rate of 20 percent per year, and with clients valuing my services and willing to
 pay (very much more) for them, I should be very happy and move heaven and earth to satisfy the
 customer. Had I a problem with employees who quit for better jobs where they were not so
 overworked, and where they were allowed time to attend to their professional development, I
 6 would raise salaries and make the working conditions better, and also *let the employees see
 actions taken*. I would certainly not cut the services to the customers and tell them to go away,
 read the enclosed material, and figure out how to do it yourself.

11

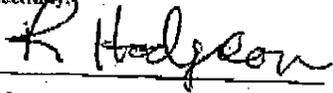
CERTIFICATE OF FACSIMILE TRANSMISSION UNDER 37 CFR 1.8(a) and (b), 37CFR 1.86(f)-

I hereby certify that the following attached correspondence comprising Response and Amendment is being sent by facsimile transmission to
 Commissioner of Patents, Alexandria, VA, 22313-1450 FAX NUMBER 571-273-7735 on May 1, 2006

16

822 Pinesbridge Road, Ossining, NY 10562.
 914-914-302-6303 (Fax 914-762-4126)
 E-MAIL - patents@alp.org

Respectfully,



Rodney T. Hodgson Agent # 37,849

21