

Dear Mr. Bahr,

The Notice of proposed rulemaking titled "37 CFR Part 1 [Docket No.: 2005-P-055] RIN 0651-AB87 Changes to the Practice for Handling Patent Applications Filed Without the Appropriate Fees" states that:

"A 21.6 cm by 27.9 cm (8 ½ by 11 inches) sheet of paper with a top margin of 2.0 cm (¾ inch), a left side margin of 2.5 cm (1 inch), a right side margin of 2.0 cm (¾ inch), and a bottom margin of 2.0 cm (¾ inch), will contain about 30 lines of double-spaced text, with each line having about 50 to 65 characters. An ASCII text (the only format permitted by § 1.52(e)) document containing 30 lines of text, each line having about 50 to 65 characters, will be slightly less than two kilobytes in size. Therefore, the Office is proposing that each two kilobytes of content submitted on an electronic medium shall be counted as a sheet of paper for purposes of the application size fee specified in 35 U.S.C. 41(a)(1)(G) (§ 1.16(s) and §1.492(j))."

There must be some mistake. Since when does a single sheet of a typical electronic drawing measure "slightly less than two kilobytes in size"? I would expect an average size of at least 50 kilobytes, and would not be surprised to see an average ranging from 100 to 200 kilobytes.

Please clarify that the rule change is intended for sheets of the specification, and excludes drawings, submitted on an electronic medium. Thank you.