

**From:** Graham Ross  
**To:** [Fee.Setting](#)  
**Subject:** Fee Setting  
**Date:** Monday, August 13, 2018 11:39:58 AM

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Dear Sir:

I wish to state my **opposition** to the announced **New Fee Codes for Annual Active Patent Practitioner Fees**, lines 195-198 of the published table of proposed fees.

I am a patent agent working as the VP of R&D for a medical device company. In addition to directing the engineering activities of company, my responsibilities include the preparation and filing of patent applications and prosecution of our portfolio of applications. I do not file patent applications myself. I do often use Private PAIR to review the status and download documents regarding our pending applications and I do attend Examiner Interviews. I also file patent applications on a *pro bono* basis for private inventors.

While a \$410 fee is a trivial amount of money for a lawyer working for a law firm, it is a significant amount of money to me.

I maintain current knowledge of patent law and USPTO practices via online newsletters and articles. CLE classes would not be a benefit to me, as I am not a lawyer or directly involved in preparing legal documents. The cost and time required to take formal CLE classes is prohibitive for me and is not paid by my company.

While I applaud the requirement that the USPTO be self-funded by the fees that it charges, I believe that the fees should reflect usage of the system - i.e. that the activities should bear the fees, not a per-person flat charge that is not related to the amount of usage. I do not believe that an infrequent use such as myself should pay the same fees as a full-time patent lawyer, especially when a discount is offered for CLE classes that serve not purpose for me.

Best regards,

Graham Ross  
65,274