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From: mcmanus&assoc [mailto:hersanctuary@sbcglobal.net]

Sent: Tue 5/2/2006 10:59 AM

To: AB93Comments

Cc:

Subject: proposed rule change

Cont/RCE/CIP

1. A CIP is a totally different animal from a CONT or RCE Application. It cannot be lumped in with the 'only one' proposal. A CIP is not all old matter; some must inherently be new.
2. If you put the proposed rule into effect, the number of Appeals filed will increase dramatically - GUARANTEED!
3. Limiting CIP's to 2 is ridiculous! You will be seriously limiting inventiveness!
4. Train examiners better. This will significantly decrease, if not eliminate need for RCE/CONT Practice.
5. You will be violating the US Code and will open yourselves up to an APA legal proceeding.