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**From:** Moore, Steven J. [mailto:smoore@kelleydrye.com]

**Sent:** Mon 5/1/2006 12:34 PM

**To:** AB93Comments; AB94Comments

**Cc:**

**Subject:** Additional Comment

The USPTO continues to register technically-trained persons at truly record rate for practice before the USPTO regardless of the real world experience of the individual in the area of patent practice. Many of these individuals have little or no training other than study for the USPTO registration exam. These registered practitioners are given the right to represent to the public-at-large that they are qualified to represent entities in all aspects of patent practice before the USPTO, including patent application preparation and prosecution, and the representation of clients in disputes before the Office, including appeal hearings, inter partes reexaminations, and interferences. It is therefore difficult to reconcile the USPTO's recent position (Town Hall Meeting at USPTO) that it cannot hire itself out of its backlog because it takes five years before an Examiner is deemed by the USPTO as being capable of handling prosecution functions without supervision.

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