

**From:** Ron D. Katznelson <ron@bileveltech.com>  
**Sent:** Monday, November 05, 2012 2:21 PM  
**To:** fee.setting; Gongola, Janet; Picard, Michelle  
**Subject:** Request for extension of time for comments on fee rules

Dear Ms. Gongola, Ms. Picard:

I hereby request that the USPTO extend the comment period for the fee-setting regulation (77 Fed. Reg. 55028, Sept. 6, 2012) for 30 days.

This regulation and its supporting materials are unusually extensive and intricate, as they affect all phases of patent prosecution. It also includes an extensive Regulatory Impact Analysis requiring a detailed economic analysis of PTO's models, data and conclusions.

Since I have been consumed with the extended comment period for the First-To-File rules, supporting IEEE-USA's submission to be filed today, I had not been able to correctly asses last week the shortage of time early enough to request this extension then.

I appreciate your consideration and efforts to facilitate meaningful comments on the barrage of proposed rulemaking in the aftermath of the AIA.

Thank you

-----  
*Ron D. Katznelson, Ph.D.*  
*President, Bi-Level Technologies*  
*1042 N El Camino Real, Suite B-250*  
*Encinitas, CA 92024*  
**Office:** 760 650-1145; 760 753-0668 (direct)  
**Mobile:** 858 395-1440  
**Email:** [ron@bileveltech.com](mailto:ron@bileveltech.com)  
**Selected Works:** <http://works.bepress.com/rkatznelson>