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General Comment

Reexamination fees shouldn't be raised while examination fees remain unchanged. It's not logical that the cost to reexamine a patent can be much higher than the cost to issue a patent.

Moreover, if reexaminations result in changes 77% of the time (per <http://www.masshightech.com/stories/2012/02/06/daily34-Cost-of-patent-reexamination-may-skyrocket.html>), then charging much more to correct an error in an issued patent than the cost to issue the patent in the first place doesn't make sense.

If the reexamination fee must be raised to reflect actual costs, then the cost to issue the patent should be raised as well so that better (and probably fewer) patents can be issued.

Kevin