



U.S. Department of Justice

Executive Office for United States Attorneys

Office of Legal Education

National Advocacy Center
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Columbia, SC 29201-3836
<http://www.usdoj.gov/usao/eousa/ole.html>

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March 5, 2008

Ronald R Carpenter
Clerk of the Supreme Court
State of Washington
415 12th Ave SW
PO Box 40929
Olympia, WA 98504-0929

RECEIVED
SUPREME COURT
STATE OF WASHINGTON
08 MAR 10 AM 8:26
Y RONALD R. CARPENTER
CLERK

Re: Comments on Proposed Changes to APR Rule 11 and the APR Rule 11 Regulations

Dear Mr. Carpenter:

We appreciate the opportunity to comment on the proposed changes to APR Rule 11 and the APR 11 Regulations.

The Department of Justice, Office of Legal Education (OLE), provides training for federal legal personnel in various federal government agencies around the country. OLE's perspective differs from traditional, national CLE providers in that we are mandated by federal regulation to provide training for federal legal personnel. OLE has no legal or policy obligation to provide MCLE credit for its training, but has historically offered MCLE accreditation assistance as a free service to government employees. A number of our federal government attorneys, in our United States Attorneys' Offices around the state and in various government offices across the nation are members of the Washington State Bar Association.

We strongly support the proposed revisions to the APR rules and regulations. We believe the proposed revisions not only clarify, but also correct some of the inequities that are in the existing rules and regulations with regard to MCLE sponsorship by non-profit, government training academies. We commend the drafters of these revisions for their understanding of the issues and for taking steps to make the rules and regulations for MCLE accreditation and compliance more uniform and fair.

We respectfully urge the Court to adopt these revisions and are available to provide additional details on our position should the Court inquire.

Sincerely,

Kent Cassibry
Assistant Director-Distance Education