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Subject: [Rule Proposal Comment] Mandatory Continuing Legal Education (MCLE)-Brian Tollefson

The proposed rule is very similar to another effort attempted by the MCLE Board a few years ago. At that former time, the WSBA Board of Governors suggested a compromise rule. I believe that the WSBA Board compromise is the current rule.

The GR9 cover sheet for the current proposed rule points out that WSBA's members and the WSBA Board of Governors have given input. I urge the Supreme Court Rules Committee to carefully consider that input.

Parts of the proposed rule constitute micromanagement of legal professionals. Further, parts of the proposed rule are insulting because the proposed rule implies that legal professionals are perhaps unable to keep up on technology security and, worse, have mental health issues. While the GR9 cover sheet argues that a certain percentage legal professionals have some concerns that might be construed as mental health issues, that does not mean that the whole legal profession has mental health issues. The cover sheet narrative about security breaches at a few legal sites does not mean that a MCLE technology requirement will stop these attacks. Moreover a legal businesses' technology security is likely to be operated by technology professionals not legal professionals.

Please do not adopt the technology and mental health requirements currently being proposed. There are alternative and less restrictive methods available to address any technology and mental health concerns in the legal profession being regulated by the Supreme Court Rules.