

Rosaline Sullivan
Legal Services Board
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26 October 2009

Dear Rosaline

Re: LSB Consultation: Internal Governance and Practising Fee Rules

Thank you for allowing the CLC the opportunity to comment on this Consultation Paper.

The CLC has no comments to make on the draft rules and the underlying policy other than to reiterate a point made at paragraph 26 of the CLC's Response to question 14 of the first consultation:

We also consider that, subject to appropriate safeguards, there should be a de minimis provision which permits movements in the practice fee, say in line with the RPI or CPI index, without the need to comply with the full approval procedure.

The CLC's view remains that in the interests of proportionality Approved Regulators should, with the agreement of the LSB, not be required to incur the substantial costs in consulting the profession and other stakeholders where it is proposed that fees should remain unchanged, or be subject to minor change.

Yours sincerely

Victor Olowe
Chief Executive

