

Legal Services Board
7th Floor, Victoria House
Southampton Row
UK - London WC1B 4AD

Brussels, 25 January 2010

Dear Mahtab Grant,

I refer to the Legal Services Board consultation paper of 18 November 2009 on 'Alternative business structures: approaches to licensing'.

I note that the paper specifically refers to the CCBE and its response to the initial discussion paper of the Legal Services Board, stating that: *"The CCBE has stated in its response to our discussion paper on ABS that allowing non-lawyers into a law firm could compromise lawyers adherence to their professional principles. However, our statutory and regulatory framework seeks to mitigate that risk."*

The CCBE considered this latest consultation paper at the Standing Committee meeting on 23 January 2010. Delegations expressed their concern about how these proposals are being taken forward. The CCBE is of the opinion that properly conducted research into the possible impact of the changes being proposed is vital before any decisions are made to change the UK legal services market in such a radical manner. It seems however that the Legal Services Board did not undertake any research in this area but that it is proposing now to introduce a regime without knowing what the impact is, simply based on the assumption that these new business structures will benefit consumers. In an area as important as the administration of justice, the CCBE believes that it is of utmost importance to carry out proper impact assessments in order to have a clear understanding of the consequences. The CCBE also wonders why the Legal Services Board does not propose properly to evaluate the functioning of Legal Disciplinary Practices, before taking forward the other proposals.

You will find attached for your convenience a copy of the CCBE's response to the initial discussion paper of the Legal Services Board, the arguments of which we believe to be still valid.

We are happy to discuss this any further with you if you wish.

Yours sincerely,



José María Davó Fernández
CCBE President