UNITED STATES OF AMERICA

FEDERAL TRADE COMMISSION

Washington, DC 20580

April 20, 2009

viafacsimile (808-539-4801) andfirst-class mail
Judiciary Public Affairs Office
417 South King Street
Honolulu, HI 96813

DEPARTMENT OF JUSTICE
Washington, DC 20530

Re: Comments on Revised Proposed Rule Concerning Unauthorized Practice of Law

Dear Sir or Madam:

The Justice Department and the Federal Trade Commission ("FTC") are pleased to
provide comments on the revised version of the rule proposed by the Hawai' i State Bar
Association ("HSBA") concerning the unauthorized practice of law ("UPL").

The Department and the FTC commented on the original version of the proposed rule in
a letter to this Court dated January 25,2008. In our letter, versionAssociat Sm: 91 -159sTj 0.0227 T6052 Tc 1.6 9 (by)Tj 0.0 the Tposed o

proposed rule contains many exceptions and exclusions which allow for non-lawyers to compete with lawyers to provide many services. But exceptions

the public's access to legal services.,,4 Our suggested modifications would further illuminate under what circumstances non-lawyers