

From: [BPL-BoardSupport](#)
To: [MacIntosh, Weston \(LARA\)](#)
Subject: Fwd: Comments for the PE Board
Date: Tuesday, October 12, 2021 3:57:44 PM
Attachments: [Comments to PE Board.doc](#)

From: James McLaughlin <jcm@kettering.edu>
Sent: Tuesday, October 12, 2021 3:40 PM
To: BPL-BoardSupport
Subject: Comments for the PE Board

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Dear Board Support: Please provide the Professional Engineering Board with the accompanying letter.

Thank you, James C. Mc Laughlin

James C. Mc Laughlin
Associate University Counsel
Emeritus Professor of Electrical Engineering
Kettering University

Department of Licensing and Regulatory Affairs
Bureau of Professional Licensing - Boards & Committees Section
P.O. Box 30670
Lansing, MI 48909-8170
Attention: Policy Analyst

Via Email: BPL-BoardSupport@michigan.gov

In regards to: Proposed revisions to the Professional Engineering rules - MOAHR 2021-020LR

1. Background: The undersigned and other Professional Engineers who practice in academia (ABET accredited universities); or perform engineering research; or practice professional engineering in fields such as electrical, chemical, or air/nautical engineering, have found the current CE rules not to be aligned with the way CE is actually performed. Augmented CE rules have been advocated to correspond to how such Professional Engineers effect CE..
2. Proposed new Rule 41(1)(j): The PE Board is commended for proposing this new rule as the new rule reflects a part of what many Professional Engineers routinely do as part of their CE. However, truncating credit at four hours per renewal period is woefully inadequate to effect the goal of CE found in Rule 1(1)(c)
3. Proposed Rule 41(1)(k) and Rule 41(1)(e): Receiving a Patent from the PTO requires significant expense, long periods of time/effort; and satisfying a novelty and obviousness requirement far in excess of that required by Rule 41(1)(e). Ten hours seems quite an inadequate credit for overcoming such barriers. Mindful of the CE aspects of a utility patent application, the Board should include publication of a utility patent application by the PTO in the list of publications in Rule 41(1)(e).
4. Provision should be made within Rule 41 for CE credit for engineering faculty at ABET universities who work with engineering students in research involved in crafting a thesis as part of an ABET engineering program. Inherently, this sort of mentoring accrues CE to the faculty member and has nothing to do with job description.

The Board is thanked for their continuing consideration of the expensive CE requirement, and having the requirement be inclusive of engineers across all areas of professional practice, and to promote and support continuing education and professional competence to include how many Professional Engineers perform CE.

Regards, James C. McLaughlin; P.E., J.D. October 12, 2021
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