

**From:** Christie, John M  
**Sent:** Monday, November 05, 2012 10:50 AM  
**To:** fitf\_guidance  
**Cc:** Jones, Yvette M; Courtney, Sharon P  
**Subject:** Docket No. PTO-P-2012-0024 (77FedReg43759)

November 5, 2012

Via email: [fitf\\_guidance@uspto.gov](mailto:fitf_guidance@uspto.gov)

Mail Stop Comments—Patents  
Commissioner for Patents  
P.O. Box 1450  
Alexandria, VA 22313-1450

Attn: Mary C. Till  
Senior Legal Advisor  
Office of Patent Legal Administration  
Office of the Deputy Commissioner for Patent Examination Policy

Re: Docket No. PTO-P-2012-0024 (77FedReg43759)

Founded in 1834, Tulane University is one of the most highly regarded and selective independent research universities in the United States. A member of the prestigious Association of American Universities, we take pride in being a part of this select group of universities with “pre-eminent programs of graduate and professional education and scholarly research.” Our schools and colleges offer undergraduate, graduate and professional degrees in the liberal arts, science and engineering, architecture, business, law, social work, medicine and public health and tropical medicine.

Tulane’s commitment to distinguished research in all fields has led to a concomitant commitment to technology transfer, which began in earnest at Tulane well before the formal establishment of an office dedicated to the function. Key researchers in the School of Medicine sought patent protection for their inventions beginning in the early 1980s, and worked proactively with industry to develop these inventions and bring them to market. Since that time, the Office of Technology Transfer and Intellectual Property Development has successfully moved the fruit of Tulane researchers into industrial collaborations aimed at bringing new technologies to market to deliver meaningful public benefit.

Today’s Office of Technology Transfer and Intellectual Property Development is developing inventions from faculty and trainees across the university, at present including inventions from the School of Medicine, the School of Science and Engineering, the School of Public Health and Tropical Medicine, and the School of Law. Broad vision, a wealth of experience and institutional support at the highest levels ensure that Tulane will remain a leader in university technology transfer well into the future.

Tulane recognizes the need for a robust patent system in the United States in order to provide meaningful protection to valuable intellectual property and to incentivize investment in product development. Tulane has supported the efforts in patent reform that culminated in the America Invents Act (AIA) that should strengthen the national climate for innovation and enable greater economic development in high technology areas.

Tulane would appreciate the opportunity to add its voice to those comments already received in regard to the proposed Examination Guidelines (Docket No. PTO-P-2012-0024; 77FedReg43759) and their possible effect on the patent system, as seen from a university perspective. Tulane strongly supports the comments already provided by the AAU, ACE, AAMC, APLU, AUTM and COGR in their letter of October 5, 2012. We also add our concurrence with the comments of the Wisconsin Alumni Research Foundation provided to your office on October 4, 2012.

Tulane would respectfully ask the USPTO to consider carefully the arguments and suggestions made in these two letters, especially in regard to their potential effect on research institutions.

With respect,

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