

From:

Sent: Friday, May 14, 2010 2:38 PM

To: extended_missing_parts

Subject: Comments on Docket No.: PTO-P-2010-0029 - 12 month extension

Please see attached comments on the above referenced issue. Thank you.

Anthony P. DeCrappeo

President

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COGR

an organization of research universities

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SUBJECT: Request for Comments on Proposed Change to Missing Parts Practice
(75FR16750; Docket No.: PTO-P-2010-0029)

Dear Ms. Jones:

The Council on Governmental Relations (COGR) is an association of 182 U.S. research-intensive universities, affiliated hospitals and research institutes that is specifically concerned with the impact of government regulations, policies and practices on the performance of research conducted at its member institutions.

We strongly support the effective 12 months extension of the existing 12-month provisional application period through the missing parts practice as proposed in the subject Notice. The ability to file provisional patent applications has been highly beneficial to the university community, particularly given the early stage nature of technologies typical of university inventions. The ability to have additional time to assess market viability and find commercial partners for further development would be of particular benefit to universities, and also consistent with the Administration's current emphasis on enhancing the commercialization of university research. The added flexibility provided by extending the response period for a missing parts notice would not only give university applicants more time to assess commercial value but also allow better targeting of resources for this purpose, as stated in the Notice. University patent budgets are under great strain, and we fully support measures such as proposed that may lead to greater efficiencies.

The higher education associations including COGR that have been involved with current patent reform efforts also strongly support the 18-month publication period, which also would be enhanced by the proposed extension. We also support the option of an international style search report.

We appreciate that USPTO is seeking ways to ease the burdens of patent applicants and create greater efficiencies both for applicants and PTO staff.

Sincerely,



Anthony DeCrappeo