

June 25, 2020

**RE: PTAB Rules of Practice for Instituting on All Challenged Patent Claims and All Grounds and Eliminating the Presumption at Institution Favoring Petitioner as to Testimonial Evidence, Docket No. PTO-P-2019-0024**

United States Patent & Trademark Office  
600 Dulany Street  
P.O. Box 1450  
Alexandria, VA 22313

To Whom It May Concern:

The Trade Alliance to Promote Prosperity (TAPP), extends its comments of support to the United States Patent and Trademark Office (USPTO) for its proposed changes to rules of practice for instituting review on all challenged claims or none and the elimination of the presumption that a patent owner's testimonial evidence be viewed in a light most favorable to the petitioner. TAPP thanks USPTO Director Andrei Iancu and Deputy Director Laura Peter for their leadership in creating a regulatory environment that is more friendly to inventors and fosters innovation within our borders.

These changes rectify problems that stemmed from the inaugural rules of the Patent Trial and Appeal Board (PTAB) in 2012. Decisions by the USPTO have long-since been obfuscated by inconsistency and unpredictability at the expense of American innovators. This system has encouraged the legal harassment of patent owners, often by interests much larger and more powerful than the patent owner themselves. These proposed rule changes are a step in the direction of fostering the growth of – and innovation from – small, independent American companies.

TAPP is a longtime advocate of intellectual property protection and celebrates these proposed rules for their potential to move American innovation forward in a meaningful way. A growing economy relies on a strong patent system that protects the rights of companies and individuals that drive us forward at the cutting-edge of technology.

Sincerely,

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