Dear Mr. Engel:

I offer this question to the Notice of Proposed Rulemaking dated January 24, 2014, entitled Changes to Require Identification of Attributable Owner. In the Notice, the United States Patent and Trademark Office is proposing to require that the attributable owner, including the ultimate parent entity, be identified during the pendency of a patent application and at specified times during the life of a patent.

**Question:** Does this disclosure requirement include inventors or contributors who receive a share of royalties from their university employers as part of a royalty sharing policy, such as that required under the Bayh–Dole Act?

Thank you.