January 30, 2012

The Honorable David Kappos  
Under Secretary of Commerce for Intellectual Property and  
Director of the United States Patent and Trademark Office  
US Department of Commerce  
Madison Buildings (East & West)  
600 Dulany Street  
Alexandria, VA  22314

Re:  Response to Request for Comments: Nationwide Workforce Program  
Docket No. PTO-C-2011-0066

Dear Under Secretary Kappos:

The University of Connecticut's supports the State of Connecticut's proposal to host a satellite office of the US Patent and Trademark Office (USPTO). There is a strong tradition of ingenuity and innovation by the men and women of Connecticut and New England, a tradition which continues at the University of Connecticut. The University is among the top 20 public institutions in the country, with enrollment of more than 30,000. Combined with the Health Center in Farmington, the University received more than $226 million in external funding in FY 2011.

The University's Center for Science and Technology Commercialization (CSTC) has approximately 80 invention disclosures per year for the last 12 years. There are currently 96 active licenses and options with over $1 million in total revenue annually. Key licenses include those with Boston Scientific, Air Products, 3M, and Syngenta. The CSTC manages the Intellectual Property and commercialization for Hartford Hospital and the Connecticut Children's Medical Center. Since 1997, 36 companies have been started by the University. Three UConn inventions are listed in Association of University Technology Managers Better World Report including a dental material as one of 100 best inventions of the 20th Century.

The University of Connecticut is developing a Technology Park at the Storrs campus in collaboration with industry partners. The Tech Park will leverage key research and development in advanced materials, biomedical engineering and information systems into commercial products that will benefit the high-technology manufacturers and entrepreneurs. The facility, to be completed in 2015, will consist of 125,000 ft. of flexible-use laboratories featuring highly specialized equipment to support collaborative research and development activities among university, industrial and entrepreneurial partners.

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The Intellectual Property and Entrepreneurship Law Clinic (IP Law Clinic) at the University of Connecticut's School of Law provides pro-bono legal services to Connecticut's innovator-entrepreneurs on an extensive range of intellectual property (patent, trademark, copyright and trade secret) and related business law issues. Since the IP Law Clinic opened its doors in January 2007, it has assisted more than 200 clients.

In July of 2008, the IP Law Clinic was honored as one of six law school clinics in the nation selected by the U.S. Patent and Trademark Office to participate in a two-year pilot program under which law students are granted limited recognition to practice law (while under attorney supervision) before the U.S. Patent and Trademark Office. The IP Law Clinic's participation in this program has been extended continuously since that time.

A location in Connecticut would allow the USPTO to take advantage of the existing resources in Connecticut and at the University. Connecticut ranks very highly among states with respect to patents per capita. Within a two-hour drive from Hartford, there are a number of active inventors/patent applicants, as well as several excellent research universities, engineering schools, and law schools with a strong reputation in intellectual property law.

Connecticut has an available employee pool with advanced training in law, engineering and a number of scientific fields. Experienced support personnel are also available as there is a large number of patent agents and patent attorneys within commuting distance of Hartford.

A Hartford location would be an excellent way to meet the interests of the USPTO and the region's inventors and entrepreneurs, and so we commend the proposal by Connecticut to host such an office and thank you for your consideration.

Sincerely,

Mary Holz-Clause, Ph.D.
Vice President for Economic Development

cc:  President Herbst
     G. Garber
     C. Pickett