January 27, 2012

Mr. Azam Khan  
Deputy Chief of Staff  
United States Patent & Trademark Office  
Mail Stop Office of Under Secretary and Director  
P.O. Box 1450  
Alexandria, VA 22313-1450

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

Dear Mr. Khan:

This letter is in response to the Request for Comments regarding potential locations for United States Patent & Trademark Office (“USPTO”) satellite offices. For at least the following reasons, I strongly encourage the USPTO to consider locating a satellite office in the City of Hartford, Connecticut.

Hartford is the most compelling choice for a USPTO satellite office because it possesses a remarkably productive workforce, a wide array of world-class technology companies and research institutions, and the highest concentration of patent practitioners in the country, within a reasonable distance. A USPTO satellite office in Hartford could improve the level of service provided to practitioners and inventors in an eight-state region consisting of the six New England states, plus New York and New Jersey (“the eight-state region”), which includes the cities of Boston and New York, and is home to more patent practitioners than any other area of the country. Further, greater Hartford enjoys a very high quality of life that would prove to be attractive to patent examiners, trademark examining attorneys and staff who would ultimately be assigned to a USPTO satellite office here.

My assessments of Hartford’s strengths as a candidate, and the advantages of locating a USPTO satellite office in Hartford, are summarized in greater detail below.

1. Geographic Significance and Economic Clout

Hartford is the epicenter of one of the most economically powerful regions in the United States, and has been recognized as having the most productive
workforce anywhere on the planet. According to the Centre for International Competitiveness’s latest world rankings, Hartford’s workers provide the greatest per capita contribution to the Gross Domestic Product, and its businesses spend more on research & development per capita, of any city in the world. Located roughly equidistant to both Boston and New York, Hartford is also the centroid of one of the most populous regions in the country, as over 23 million people live within 150 miles of Hartford – more than any city in the United States besides New York.

Placing a satellite office in Hartford would enable the USPTO to provide in-person service to an impressive assortment of companies located in Hartford, throughout Connecticut and around the northeast. Hartford is the headquarters of United Technologies Corporation, as well as several major insurers such as The Hartford, Aetna and Travelers. Additionally, UnitedHealth Group, XL Reinsurance and Phoenix also have major operations in the “Insurance Capital of the World.”

Beyond Hartford, several other technological titans are based in the State of Connecticut. For example, the world headquarters of General Electric Company – the sixth-largest company on the Fortune 500 index – is located in Fairfield, and its Global Patent Operation is located in Shelton, each within an hour of Hartford. Additionally, eight of UTC’s nine business units also call Connecticut home. Major biotechnology and pharmaceutical firms such as Bayer Healthcare Pharmaceuticals, Boehringer Ingelheim Pharmaceuticals, Bristol-Meyers Squibb and Pfizer, Inc., all have major research operations in Connecticut, and high-technology manufacturers such as the Electric Boat Division of General Dynamics, Stanley Black & Decker and Xerox are also based here. Moreover, Connecticut has developed a reputation as a world leader in media and communications, as NBC Sports will join ESPN, Sonalysts Studios and World Wrestling Entertainment in the State by 2014.

Outside of Connecticut, the eight-state region is home to some of the most advanced technology companies found anywhere in the world. In 2011, 104 of the companies on the Fortune 500 index – over twenty percent – were located in the region.

A USPTO satellite office in Hartford could also serve several research institutions located within a short distance of the city. The main campus of the University of Connecticut is just twenty miles from downtown Hartford, and the UConn Health Center is located just eight miles away. UConn, which was recently ranked as the 19th best public university by U.S. News & World Report, is in the midst of a $2.3 billion enhancement that will soon be augmented by an $864 million expansion of the Health Center and a $1.1 billion genomics and personalized medicine laboratory to be built by The Jackson Laboratory at the Health Center site. Other renowned research institutions in the vicinity of Hartford include Yale University in New Haven, 30 miles to the south, and the University of Massachusetts, in Amherst, Mass., 40 miles to the north.

Moreover, the eight-state region includes some of the finest colleges and universities in the world, and all are located within a relatively short distance from Hartford. Seven of
the eight Ivy League schools,9 and 17 of the top 50 research institutions in the United
States, according to The Center for Measuring University Performance,10 are located in
the region. According to U.S. News & World Report, the eight-state region is home to
28 of the nation’s top 100 national universities, and 20 of nation’s the top 50 liberal arts
colleges.11 The entrepreneurship taking place at each of these schools would be well-
served by a USPTO satellite office in Hartford.


Since the Industrial Revolution, Connecticut has regularly ranked on or atop the list of
the states with the most patents issued per capita.12 Based on the most recent data
available, Connecticut residents have filed the sixth-most patent applications per capita,
and have been granted the ninth-most patents per capita.13 Additionally, Connecticut
ranks fifth in the number of patent prosecutors per capita in the State.14

While these statistics alone indicate that Connecticut is worthy candidate for a USPTO
satellite office on its own, the value of placing a USPTO satellite office in Hartford is
best demonstrated by considering the eight-state region as a single entity – one that is
approximately the same size as Arizona, and has a population greater than that of
California and Oregon combined – and comparing patent-related statistics in the region
to those of other states, as each of the states in the eight-state region is located within a
short and easy commute to Hartford.

The states having the most patent applications filed by residents, per capita, are shown
in Table 1, below. As is set forth in Table 1, four of the top 10 states are located in the
eight-state region, whose residents filed 27 percent more patent applications than the
national average.

Table 1 – Patent Applications Per Capita, by State, 200915

<table>
<thead>
<tr>
<th>Rank</th>
<th>State</th>
<th>Applications per 100,000 Residents, 2009</th>
<th>Applications, 2009</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Washington</td>
<td>187.66</td>
<td>12,619</td>
</tr>
<tr>
<td>2</td>
<td>California</td>
<td>177.52</td>
<td>66,132</td>
</tr>
<tr>
<td>3</td>
<td>Massachusetts</td>
<td>174.37</td>
<td>11,417</td>
</tr>
<tr>
<td>4</td>
<td>Minnesota</td>
<td>147.16</td>
<td>7,805</td>
</tr>
<tr>
<td>5</td>
<td>New Hampshire</td>
<td>114.70</td>
<td>1,510</td>
</tr>
<tr>
<td>6</td>
<td>Connecticut</td>
<td>112.17</td>
<td>4,009</td>
</tr>
<tr>
<td>7</td>
<td>New Jersey</td>
<td>109.44</td>
<td>9,622</td>
</tr>
<tr>
<td>8</td>
<td>Oregon</td>
<td>102.09</td>
<td>3,911</td>
</tr>
<tr>
<td>9</td>
<td>Delaware</td>
<td>100.68</td>
<td>904</td>
</tr>
<tr>
<td>10</td>
<td>Colorado</td>
<td>99.80</td>
<td>5,019</td>
</tr>
<tr>
<td>12</td>
<td>Vermont</td>
<td>98.44</td>
<td>616</td>
</tr>
<tr>
<td>15</td>
<td>New York</td>
<td>77.91</td>
<td>15,098</td>
</tr>
<tr>
<td>19</td>
<td>Rhode Island</td>
<td>63.27</td>
<td>666</td>
</tr>
<tr>
<td>43</td>
<td>Maine</td>
<td>25.90</td>
<td>344</td>
</tr>
<tr>
<td></td>
<td>Eight-State Region</td>
<td>101.57</td>
<td>43,282</td>
</tr>
<tr>
<td></td>
<td>United States</td>
<td>79.93</td>
<td>246,777</td>
</tr>
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</table>
Next, the states having the most patents issued to residents, per capita, are shown in Table 2, above. As is set forth in Table 2, five of the top 10 states are located in the eight-state region, whose residents were issued 28 percent more patents than the national average.

Finally, the states having the most patent practitioners, per capita, are shown in Table 3, below. As is set forth in Table 3, three of the top four states for patent practitioners include the District of Columbia, Delaware and Virginia. Patent practitioners in each of these states, however, are easily served by the main USPTO office in Alexandria. Four of the seven remaining states in the top 10 – Massachusetts, Connecticut, New Jersey, and New York – are located in the eight-state region, and would be collectively best served by a USPTO satellite office in Hartford. As is shown in Table 3, the eight-state region is the most underserved area of the nation, and the states of Connecticut and Massachusetts are the most underserved states, per capita, for patent prosecution.

In summary, the data set forth in Tables 1-3 present arguably the strongest argument for placing a USPTO satellite office in Hartford. Tables 1 and 2 demonstrate that the residents of the eight-state region have filed more patent applications, and have been issued more patents, than any state in the nation except California. Table 3 indicates that the eight-state region is home to more patent practitioners than any state in the nation – nearly 17 percent more than California.
### Table 3 – Patent Practitioners by State and Per Capita, 2009

<table>
<thead>
<tr>
<th>State</th>
<th>Practitioners Per Capita Rank</th>
<th>Practitioners per 100,000 Residents</th>
<th>Practitioners Rank</th>
<th>Practitioners</th>
</tr>
</thead>
<tbody>
<tr>
<td>District of Columbia</td>
<td>1</td>
<td>312.27</td>
<td>5</td>
<td>1,879</td>
</tr>
<tr>
<td>Delaware</td>
<td>2</td>
<td>30.96</td>
<td>26</td>
<td>278</td>
</tr>
<tr>
<td>Massachusetts</td>
<td>3</td>
<td>21.87</td>
<td>7</td>
<td>1,432</td>
</tr>
<tr>
<td>Virginia</td>
<td>4</td>
<td>18.87</td>
<td>6</td>
<td>1,726</td>
</tr>
<tr>
<td>Connecticut</td>
<td>5</td>
<td>18.61</td>
<td>16</td>
<td>665</td>
</tr>
<tr>
<td>Minnesota</td>
<td>6</td>
<td>17.97</td>
<td>11</td>
<td>953</td>
</tr>
<tr>
<td>Illinois</td>
<td>7</td>
<td>16.24</td>
<td>4</td>
<td>2,084</td>
</tr>
<tr>
<td>New Jersey</td>
<td>8</td>
<td>15.40</td>
<td>9</td>
<td>1,354</td>
</tr>
<tr>
<td>California</td>
<td>9</td>
<td>15.33</td>
<td>1</td>
<td>5,711</td>
</tr>
<tr>
<td>New York</td>
<td>10</td>
<td>15.24</td>
<td>2</td>
<td>2,953</td>
</tr>
<tr>
<td>New Hampshire</td>
<td>17</td>
<td>9.65</td>
<td>30</td>
<td>127</td>
</tr>
<tr>
<td>Vermont</td>
<td>23</td>
<td>7.03</td>
<td>40</td>
<td>44</td>
</tr>
<tr>
<td>Rhode Island</td>
<td>33</td>
<td>3.80</td>
<td>42</td>
<td>40</td>
</tr>
<tr>
<td>Maine</td>
<td>34</td>
<td>3.39</td>
<td>39</td>
<td>45</td>
</tr>
<tr>
<td>Eight-State Region</td>
<td></td>
<td>15.63</td>
<td></td>
<td>6,660</td>
</tr>
<tr>
<td>United States</td>
<td></td>
<td>10.62</td>
<td></td>
<td>32,797</td>
</tr>
</tbody>
</table>

Therefore, quite clearly, a USPTO satellite office belongs in the eight-state region. Because Hartford is a significant hub of patent activity in its own right, and is within a relatively short commute from both Boston and New York, Hartford is the best site for a northeastern USPTO satellite office.

3. **Quality of Life**

Connecticut’s quality of life is perhaps the State’s greatest asset, and would improve the recruiting and retention of patent examiners, trademark examining attorneys and staff.

Residents of Connecticut have the highest per capita incomes in the United States, and the State is ranked as America’s fourth-healthiest. For young professionals, there are a number of affordable and attractive apartment and condominium options in vibrant areas in downtown Hartford, nearby West Hartford Center, and other appealing neighborhoods around the region. For families, many of the Hartford-area suburbs offer much in terms of quality of life, and the Hartford region ranks no. 1 in the United States for its investments in primary and secondary education.

Examiners who are stationed at a USPTO satellite office in Hartford could take advantage of any of a number of the Hartford region’s numerous recreational offerings, including outdoor activities, arts and cultural centers, and athletic facilities. Additionally, examiners who may be interested in earning advanced degrees could choose to enroll in law school at the UConn School of Law, or in business school at the UConn Graduate Learning Center or the Rensselaer Polytechnic Institute’s branch campus, all of which are located in Hartford.
Hartford is easily accessible through a number of transportation facilities. Downtown Hartford lies at the crossroads of Interstates 84 and 91, and is just twelve miles south of Bradley International Airport in Windsor Locks, which services over 350 daily flights to and from nearly every major city on the East Coast. By rail, Hartford is located along Amtrak’s Northeast Regional line, and the State of Connecticut and Commonwealth of Massachusetts are presently developing an enhanced commuter rail service between the cities of New Haven, Hartford and Springfield, Mass. The commuter rail would functionally link Hartford with the Metro-North Railroad’s New Haven line, the busiest rail line in the United States.  

4. Possible Satellite Office Locations  

Hartford suffers from many of the same economic maladies as Detroit, which was selected as the site of the first USPTO satellite office. Placing a USPTO satellite office in Hartford would provide a much-needed boost to the City’s economy, as the value of Hartford’s commercial real estate is at an historic low. Indeed, according to a recent study, nearly thirty percent of Hartford’s Class A office space is presently vacant, and average Class A rental rates have tumbled to below $20 per square foot per year. By contrast, the average Class A rental rates are approximately $72.77 per square foot in New York City, $34.22 per square foot in Boston, and $21.42 per square foot in Detroit.

Therefore, a USPTO satellite office could be quickly and cost-effectively opened within the City of Hartford in a very short timeframe. For example, the USPTO could elect to rent space in downtown Hartford, construct a permanent facility, or purchase an available office building outright, at a lower cost than in Detroit, and at a significantly lower cost than in either Boston or New York.

In my opinion, an ideal location for a USPTO satellite office is Samuel Colt’s former firearms factory, which is located along the banks of the Connecticut River south of downtown. The 260-acre factory site, where the appropriately named Colt’s Patented Fire Arms Manufacturing Company assembled the revolver that became known as the “Gun that Won the West,” has been the subject of a number of redevelopment proposals over the last decade. The complex is a mixed-use commercial and residential facility that could easily accommodate a USPTO satellite office of approximately the same size as the satellite office that is planned for Detroit.

Additionally, the Colt factory site is presently being considered by Congress for designation as a National Park, under the Coltville National Historical Park Act (H.R. 2504, S. 1347). The establishment of a USPTO satellite office at the Colt factory site would perfectly complement the proposed National Park. After all, Samuel Colt himself was the named inventor on at least 14 United States patents.

5. Conclusion  

As a long-standing core of technological excellence, and the heart of one of the most populous and innovative regions in the United States, the City of Hartford is the most
appropriate site for a USPTO satellite office for the foregoing strategic, historical and logistical reasons. Therefore, I strongly encourage you to consider Hartford when determining where the next USPTO satellite offices will be located, for the City is the center of an eight-state region having a unique combination of human capital, industrial assets and educational resources that is unmatched anywhere in the world, and is easily accessible to entrepreneurs and inventors, including those in Boston and New York.

Please understand that the opinions set forth in this letter are mine alone, and should not be construed as the opinions of McCormick, Paulding & Huber LLP, or any of its clients. Should you have any questions regarding this letter, please feel free to contact me at any time. Thank you very much for your consideration.

Most sincerely

Richard Twilley
Registration No. 63,359

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3 Centre for International Competitiveness, *World Knowledge Competitiveness Index 2008*, supra note 2 (ranking Hartford as no. 3 for world productivity, no. 1 for per capita R&D business expenditures, no. 3 in private equity investment capital per capita, no. 1 in labor productivity per employee, no. 6 in earnings, in the world – no. 1 in the United States in primary and secondary education investment.
See Fortune 500: Annual Ranking of America’s Largest Corporations, supra note 5.

In addition to UTC’s headquarters in downtown Hartford, Carrier (Farmington), Hamilton Sundstrand (Windsor Locks), Otis (Farmington), Pratt & Whitney (East Hartford), Sikorsky Aircraft (Stratford), UTC Fire & Security (Farmington) and UTC Power (South Windsor), are all based in Connecticut, as is the United Technologies Research Center (East Hartford). With the exception of Sikorsky Aircraft, each of these business units is located in Hartford County.

See Fortune 500: Annual Ranking of America’s Largest Corporations, supra note 5.


These institutions include Brown University (Providence), Columbia University (New York City), Cornell University (Ithaca, N.Y.), Dartmouth College (Hanover, N.H.), Harvard University (Cambridge, Mass.), Princeton University (Princeon, N.J.), and Yale University (New Haven).


See, e.g., Bulletins of the Twelfth Census of the United States, No. 242 (Aug. 15, 1902), at 15 (“Connecticut has ranked first in patents per capita since 1850, Massachusetts being first in 1840. These states, with Rhode Island, have been the three ranking states for each census year.”).


AveryIndex, Top Patent States (Per Capita), 2009, supra note 14; 2010 United States Census. For the purposes of the rankings in Tables 1, 2 and 3, the District of Columbia is treated as a state.


Centre for International Competitiveness, World Knowledge Competitiveness Index 2008, supra note 2 (ranking Hartford as no. 1 in the United States in primary and secondary education investment).


