

December 27, 2011

Azam Khan
Deputy Chief of Staff
United States Patent and Trademark Office
Mail Stop Office of Undersecretary and Director
P.O. Box 1450
Alexandria, VA 22314

Dear Mr. Kahn,

The Smaller Business Association of New England (SBANE) is advocating that one of the two remaining satellite patent offices pursuant to the Federal Register's solicitation under the Docket No. PTO-C-2011-0060 be located in the Greater Boston area.

There are two compelling reasons that drive our rationale for this support. Firstly, Massachusetts received \$268 million from the Small Business Innovation Research (i.e. SBIR) program in 2009, which was by far the most money per capita than any other state. Concurrently, Massachusetts is the leader in per capita patents granted to private companies in 2009 by the U.S. Patent and Trademark Offices at 561 per million residents. These metrics buttress the case that Boston is the center of the research and development universe for the East Coast, which would geographically balance your initial selection of Detroit, Michigan.

There are a number of patent law firms in the New England region, which are mostly located in the Greater Boston area. The satellite office would accelerate the time in which provisional or permanent patents get processed and reduce the backlog in the current Alexandria, Virginia central office. Obviously, the Boston/Cambridge educational axis brings with it world class institutions for higher learning and cutting edge research.

With the SBIR program and prolific patent volume in Massachusetts, we think the Boston area would be an excellent fit as a satellite location due to the fact that it would mitigate and reduce the amount of time it takes to process patent filings. I believe SBANE has offered a few compelling reasons why the U.S. Patent Office should strongly consider the Boston area as one of its remaining satellite offices. Thank you for your consideration.

Sincerely.

Robert A. Baker President, SBANE

Cc: Mark B. Solomon, Chair, Boston Patent Law Association