

Dear Sir/Madam:

Regarding the proposed Changes To Implement Electronic Maintenance of Official Patent Application Records, the proposed rule would mandate that only strikethrough and underlining be used to show changes to a specification or claims of an application. Ordinarily, such methods of indicating amendments will clearly indicate the changes to be made. However, this is not universally the case, especially where the specification or claims include chemical formulae. In such cases, the use of "strikethrough" to show a deletion or underlining to show an addition is difficult to accomplish electronically and is not necessarily clear if accomplished manually. Provision should be made for alternate methods of indicating additions or deletions (such as bracketing or double hyphens) where the specification or claim to be amended includes chemical formulae or other subject matter for which a strikethrough or underline would not be clear or easily accomplished electronically.

Very truly yours,
John J. Cunniff
Reg. No. 42,451