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Paragraphs (b)(1)(i) and (ii) of Rule 53 could perhaps be given the subheading *Oath Requirements for Continuing Applications*. Similarly, paragraphs (c) and (d) of Rule 53 would fit in the revised Rule 54 as *Procedures in Cases of Incomplete Applications or Missing Parts*. All of these paragraphs relate more to completion of the application than to the filing date.

Alternatively, the oath requirements for continuing applications could be placed in any of Rules 60, 61 or 62, where they would be adjacent to Rule 63, the main rule on oaths and declarations, or they could even be added to Rule 63. Note that Rule 63 already states a requirement relating to the oath in a CIP application.

If it is decided to keep all the above provisions in rule 53, it would help make it comprehensible to have italicized subheadings, as in Rules 84 and 96. For example:

<u>Paragraph/ Subparagraph</u>	<u>Subheading</u>
(b)(1)	<i>Filing date of nonprovisional application.</i>
(b)(1)(i)	<i>Continuing applications not requiring new oath.</i>
(b)(1)(ii)	<i>Continuing applications requiring new oath.</i>
(b)(2)	<i>Filing date of provisional application.</i>
(b)(3)	<i>Continued prosecution applications.</i>
(c)	<i>Incomplete applications, filing date refused.</i>
(d)	<i>Missing parts, filing date granted.</i>

Rule 53(b)(1)(i) appears to have a typographical error in the first few lines of the second sentence, perhaps a missing comma or parenthesis. Regarding the "statement that the copy is a true copy;" several lines down in that same subparagraph, it is not clear which copy is the antecedent for "the copy." A simple fix would be to include the numbers (1) and (2) to separate the two conditions as was done in the discussion of that proposed rule.

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It is not clear how the "true copy" statement is useful. In cases where such a statement could be honestly made, i.e., where the oath had already been executed, it would seem that the executed oath and an unexecuted copy thereof would be equally available to the applicant or his attorney.

It is not clear how paragraph (b)(1)(iii) of Rule 53 is consistent with subparagraph (b)(1)(i)(A), which suggests that the inventorship does not include the names deleted pursuant to that subparagraph. Perhaps the interrelationship of the two subparagraphs could be made more clear.

Best of luck in assimilating all the comments and making appropriate amendments to the rules.

Respectfully submitted,



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