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January 30, 2012

Mr. Azam Khan
Deputy Chief of Staff
Office of the Under Secretary and Director
United States Patent and Trademark Office
Department of Commerce
445 12th Street, S.W.
Washington, D.C. 20554

Dear Mr. Khan:

Fidelity Investments¹ (“Fidelity”) appreciates the opportunity to comment on the United States Patent and Trademark Office (the “USPTO”) request for comments on additional satellite offices for the nationwide workforce program published in the Federal Register on November 29, 2011. Fidelity supports locating a USPTO satellite office in Massachusetts.

Fidelity and other members of the financial services industry are frequent patent filers. Financial services is a vital component of the Massachusetts economy, representing 170,000 jobs and \$3.5B in Gross State Product. The financial services industry relies on the patent system to encourage investment in and incentivize the creation of innovative new products, services and supporting technologies that better meet the needs of customers and reduce costs.

In addition to its robust financial services industry, Massachusetts is home to some of the most prestigious colleges, universities, law schools, technology companies, and medical centers in the world. These industries thrive on the development of new intellectual property and rely on an efficient and responsive patent system. Consequently, the state has one of the highest per-capita number of patent professionals and ranks among the highest in number of patents per capita. New England’s volume of patents and patent applications is second only to Silicon Valley.

¹ Fidelity Investments is one of the world’s largest providers of financial services, with assets under administration of more than \$3.6 trillion, including managed assets of over \$1.6 trillion. Fidelity is a leading provider of investment management, retirement planning, portfolio guidance, brokerage, benefits outsourcing and many other financial products and services to more than 20 million individuals and institutions, as well as through 5,000 financial intermediary firms.

A satellite office in Massachusetts will provide greater convenience for the financial services and other industries, improve communication with the USPTO, and decrease the number of patent applications awaiting examination. In addition, Massachusetts is an excellent location for employing patent examiners with relevant background, education, and skills, which will further help to reduce the patent approval backlog.

Fidelity appreciates your consideration of Massachusetts as a location for a satellite USPTO office. We would be pleased to provide any further information or respond to any questions that the USPTO may have.

Sincerely,

A handwritten signature in black ink that reads "Sam M. Blum". The signature is written in a cursive style with a large, stylized "S" and "B".