



June 22, 2020

United States Patent and Trademark Office
600 Dulany Street
P.O. Box 1450
Alexandria, VA 22313

**RE: Docket No. PTO-P-2019-0024
PTAB Rules of Practice Instituting on All Challenged Patent Claims and All Grounds and
Eliminating the Presumption at Institution Favoring Petitioner as to Testimonial Evidence**

To Whom It May Concern:

The Center for Innovation and Free Enterprise (CIFE) supports the USPTO's proposed changes to the rules of practice for post grant proceedings. This is a great step forward in putting the power back in the hands of the inventor on intellectual property rights.

Per the Patent Trial and Appeal Board's (PTAB) original establishment, the precise rules and practices have sometimes lacked due process protections afforded in courts and the International Trade Commission. In a three-step approach, the Notice of Proposed Rulemaking will establish a change in institution rules, permit sur-replies and patent owner responses and replies, and eliminate presumption for petitioner in PTAB trial proceedings.

The leadership of Director Andrei Iancu does not go unnoticed among patent support groups. In seeking to make the United States Patent and Trademark Office more reliable among inventors, we can create a more innovative environment to develop and secure the dependability of the patent grant.

Sincerely,

Ginevra Joyce-Myers
Executive Director
Center for Innovation and Free Enterprise
A Project of Americans for a Balanced Budget