

From: Windham Loopesko [email address redacted]
Sent: Thursday, April 24, 2014 2:28 PM
To: AC90.comments
Cc: [email address redacted]
Subject: Comments on "Changes To Require Identification of Attributable Owner"

April 24, 2014

James Engel

Senior Legal Advisor, Office of Patent Legal Administration

Office of the Deputy Commissioner for Patent Examination Policy

Your e-mail address: AC90.comments@uspto.gov

Re: Comments on "Changes To Require Identification of Attributable Owner"

Dear Mr. Engel,

We at PatentBooks, Inc. (PBI) are pleased to provide our comments with respect to the proposed rules of practice to facilitate the examination of patent applications and to provide greater transparency concerning the ownership of patent applications and patents.

We at PBI support a market-based system that will allow large-scale patent licensing for specific products on a utility basis for specific products (so that licensing patents will become as easy as obtaining water or electricity). Such a system will promote innovation by making available to intellectual property users multiple patents offering competing solutions, so that users may choose among these patents in developing their products or services.

The system we advocate also will provide for frequent regular payments directly into the accounts of patent owners from the pool of revenues provided by patent users. For this system to function effectively, it is important that patent owners provide the system administrator with their identity and the information necessary to meet financial and tax requirements (and that such information be updated periodically) so as to

assure that the payments attributable to listed patents can be directed efficiently into the appropriate bank accounts.

Because the patent owners in this system will have a financial incentive to provide the types of patent ownership information the rule is seeking, we believe that our market-based solution will provide such information on a commercially driven basis at no direct cost to the government. Moreover, PBI is willing to share the ownership information that it gathers with government agencies needing such information (e.g., the USPTO and US Customs and Border Protection) for appropriate reasons. For this reason, we do not believe that the proposed rule, with the additional costs and drains on USPTO resources that administering the rule requires, is necessary or justified.

We would be pleased to provide further information as to our proposed solution and how our ability to provide the information the rule seeks concerning identification of the attributable owner can provide greater efficiency in patent licensing and thereby promote innovation.

Very truly yours,

Arthur M. Nutter

Chief Executive Officer

PatentBooks, Inc.