

From: Bolesh J Skutnik [email address redacted]
Sent: Tuesday, April 22, 2014 11:54 AM
To: AC90.comments
Subject: Proposed Rules for Transparency of Patent Ownership

Dear Sirs,

The proposed rules as I understand them would be particularly onerous and non-useful for most small businesses which often need to use their patent rights to obtain funding and often changing funding over the time period of both prosecution of applications and lifetimes of issued patents. Foreign companies with US subsidiaries would also have problems with these reporting suggestions/requirements, where in the course of business, patents and patent applications as well as inventors/applicants come from diverse countries may need to change ownership as business models change within a particular corporation. The proposed penalties would appear to also be a great danger to small inventors as well as multi-national corporations. It would seem tha a sledge hammer is to be used to rid the annoyance of a fly. Potential for collateral damage seems likely though unpredictable in precise estimation.

Sincerely,

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