

From: Becky Suciu [email address redacted]

Sent: Tuesday, April 22, 2014 10:12 AM

To: AC90.comments

Subject: FW: Proposed Rules for Transparency of Patent Ownership: Written Comment Period to Close Soon

Hello,

I received the notification below and wanted to submit my comment for consideration on the subject of "Transparency of Patent Ownership".

I am a designer for a private company and we have been awarded over 40 patents (a few have since expired), with several applications pending. As a small company, we manage our Intellectual Property portfolio and maintenance in-house, and the responsibility falls on me personally to keep our portfolio of Patents up to date, pay fees, etc.

If I understand this proposal correctly, it will require the owner of a Patent to confirm ownership at specific periods. My understanding is this is already accomplished with the establishment of maintenance fees (on the Utility Patent side). Additionally, I feel this would be an extra burden when notification is not necessary. Requiring an additional filing – at set intervals – to continue to maintain that the same owner of an application has NOT changed – seems like a lot of extra work for patent owners who maintain control over their Intellectual Property. This also seems like a lot of extra work for the Patent office to maintain this information – when in many cases, it may just be a confirmation of the status quo.

I would agree that in situations of companies that may sell, transfer, or share rights to Intellectual Property, or where there is a business model set up to license patents, there should be a process established to allow them to formalize shifts in ownership through the USPTO and make that information available to the public. Those companies may even additionally benefit by obtaining further inquiries if the patent is designated as 'available to license', especially if this was a searchable criteria on the website.

I just prefer not to see this accomplished by placing a burden on ALL patent owners, especially those of us who do not intend to transfer ownership of IP rights. In the case of this company, we have 28 patents to track the maintenance fee payment windows for in various stages of maturity – so unless there is a simple checkbox on the payment page of the USPTO maintenance fee payment page to confirm "same owner" or "new owner" when payment of the fee is made, I would not like to see any new timelines for confirmation of ownership or additional filings required.

I appreciate your consideration and I would be happy to provide further comment.

Best regards,

Becky Suciu
Product Designer
Rose Displays, Ltd.

35 Congress Street | Salem, MA | 01970
Main: 978.825.8100, x8135

Direct: 978.219.8135
Fax: 978.825.0210

www.rosedisplays.com

From: Patents Alert USPTO News [mailto:noreply@enews.uspto.gov]
Sent: Tuesday, April 22, 2014 9:34 AM
To: Becky Suci
Subject: Proposed Rules for Transparency of Patent Ownership: Written Comment Period to Close Soon

Proposed Rules for Transparency of Patent Ownership: Written Comment Period to Close Soon

In January 2014, the USPTO published proposed rules to increase the transparency of patent ownership information for patent applications and issued patents, which we termed "attributable ownership proposed rules" as a shorthand title. You can review our attributable ownership proposed rules here: <http://www.gpo.gov/fdsys/pkg/FR-2014-02-20/pdf/2014-03629.pdf>.

The period for submitting written comments about these proposed rules closes on Thursday, April 24, 2014. Your views on our proposal are important, and we want your input. You may submit written comments by April 24th in one of three ways: (i) email; (ii) postal mail; or (iii) through the government eRulemaking portal. The addresses for each are provided below.

Method	Address
Email (preferred)	AC90.comments@uspto.gov
Postal Mail	Mail Stop Comments-Patents Commissioner for Patents P.O. Box 1450 Alexandria, VA, 22313-1450
Federal eRulemaking Portal	http://www.regulations.gov

Thank you kindly for your attention to our attributable ownership rulemaking; we look forward your comments.

--

Visit <http://www.uspto.gov/subscribe> to update or change your email preferences.

This email was sent from an unmonitored mailbox. To contact us, please visit our website <http://www.uspto.gov/about/contacts>.

Follow the USPTO on <http://www.facebook.com/uspto.gov>.

Follow the USPTO on <http://twitter.com/uspto>.

To ensure that you continue to receive our news and notices, please modify your email filters to allow mail from noreply@enews.uspto.gov . Similarly, you may instead wish to not to block any mail you receive from the enews.uspto.gov domain.