

**From:** Bob Pavey  
**To:** [PTABNPR2018](#)  
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**Subject:** proposed rule 83 FR 21221  
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Gentlemen,

I support the proposal of the United States Patent and Trademark Office (Office) to alter its claim construction standard used for interpreting IPR, post-grant review (PGR), and the transitional program for covered business method patents (CBM) proceedings before the Patent Trial and Appeal Board.

I also support the proposal to replace the broadest reasonable interpretation standard (BRI) for constructing unexpired patent claims that are used by the PTAB in IPR, PGR, and CBM with the Phillips standard, which is the standard the Federal Circuit Courts and International Trade Commission (ITC) use when interpreting patents.

These changes will promote a “fair and balanced approach, providing greater predictability and certainty in the patent system” which will, in turn, increase judicial efficiency and reduce economic waste.

As a venture capitalist I can assure you that a predictable patent process will create a level of confidence with innovators and investors, which will make us more likely to finance and bring patentable inventions to market, and this will allow the US to be more competitive in an increasingly competitive worldwide technology industry.

Yours sincerely,

Robert D. Pavey  
Managing Member  
Pavey Family Investments