

**COMMENTS ON NOTICE OF PROPOSED RULEMAKING FACILITATING THE USE OF WIPO'S
ePCT SYSTEM TO PREPARE INTERNATIONAL APPLICATIONS FOR FILING WITH THE UNITED STATES
RECEIVING OFFICE**

Mail Stop Comments—Patents
Commissioner for Patents,
P.O. Box 1450
Alexandria, VA 22313-1450

Attention: Boris Milef, Senior Legal Examiner
International Patent Legal Administration

These comments are submitted in response to the request for comments in the identified notice of proposed rulemaking published at 85 FR 5362, on January 30, 2020.

Schwegman Lundberg & Woessner supports the proposed rulemaking, and commends the USPTO for taking this action. As a firm that files over 800 International Applications in the U.S. Receiving Office each year, this rulemaking will be beneficial to our clients as well as to the USPTO.

The original 21 commenters on the proposed rules (in their joint February 7, 2020 memo) provided detailed analysis regarding the benefits and advantages to PCT applicants (and their counsel) that result from use of ePCT for filing International Applications. We agree with the indicated efficiencies both for applicants and for the Receiving Office, through verification of bibliographic information, including priority claims, through ePCT.

Respectfully submitted,

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By *Michael L. Lynch*

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