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From: Brad Pedersen [mailto:Pedersen@ptslaw.com]

Sent: Tuesday, May 02, 2006 11:18 AM

To: AB93Comments; AB94Comments

Cc: tbianchi@slwk.com; Tim Czaja; peter.forrest@gpmlaw.com; MSkoog@merchantgould.com; board@lists.statebar.gen.mn.us; sbores@STATEBAR.GEN.MN.US; McDowall, Paul; Greg Gardella

Subject: Comments on 71 Fed. Reg 48 and 71 Fed. Reg 61 by MIPLA Patent Prosecution Committee

Attached please find a cover letter and Appendix of detailed comments on both of the proposed rules.

If you should have any questions or concerns about the attachments or be unable to open them, please contact me directly at 612/349-5774.

Thank you.

Brad Pedersen
on behalf of the MIPLA Patent Prosecution Committee

May 2, 2006

Via Electronic Mail: AB93Comments@uspto.gov and AB94Comments@uspto.gov

Honorable Jon W. Dudas
Under Secretary of Commerce for Intellectual Property and
Director of the United States Patent and Trademark Office
Mail Stop Comments—Patents
PO Box 1450
Alexandria, VA 22313-1450

Attn: Robert W. Bahr, Senior Patent Attorney
Office of the Deputy Commissioner for Patent Examination Policy

Robert A. Clarke, Deputy Director
Office of Patent Legal Administration
Office of the Deputy Commissioner for Patent Examination Policy

Re: Comments on

Notice of Proposed Rulemaking Entitled “Changes To Practice for Continuing Applications, Requests for Continued Examination Practice, and Applications Containing Patentably Indistinct Claims,” 71 Fed. Reg. 48 (January 3, 2006)

Notice of Proposed Rulemaking Entitled “Changes To Practice for the Examination of Claims in Patent Applications,” 71 Fed. Reg. 61 (January 3, 2006)

Dear Under Secretary Dudas, Mr. Bahr, and Mr. Clarke:

The Patent Prosecution Committee of the Minnesota Intellectual Property Law Association (MIPLA) is grateful for the opportunity to comment on these two Notices of Proposed Rulemaking (the “Proposed Rules”).¹ The committee represents a wide and diverse spectrum of individuals, companies, and institutions involved directly or indirectly in the practice of patent law before the United States Patent and Trademark Office. The comments submitted herewith reflect the views of the Patent Prosecution Committee as a whole, and do not necessary reflect the views or opinions of either MIPLA or of any of the individual members or firms of the Patent Prosecution Committee, or of any of their clients.

Several committee meetings were held in January-April, 2006, which were dedicated specifically to the analysis of the policy and practical issues raised by the Proposed

¹ The MIPLA is an independent organization affiliated with the Minnesota State Bar Association (MSBA). The MIPLA has nearly 700 members representing all aspects of private and corporate intellectual property practice, as well as the academic community. The MIPLA Committee which submits these comments are doing so on their own authority pursuant to the bylaws of the MIPLA. These comments do not necessarily represent the views of the MIPLA or the MSBA.

