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**Sent:** Wednesday, May 03, 2006 3:31 PM

**To:** AB93Comments

**Subject:** AB93Comments

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**THE PHILADELPHIA INTELLECTUAL PROPERTY  
LAW ASSOCIATION  
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May 3, 2006

*Via Email to* [AB93Comments@uspto.gov](mailto:AB93Comments@uspto.gov)

The Honorable Jon Dudas  
Under Secretary of Commerce for Intellectual Property  
And Director of the United States Patent and Trademark Office  
Mail Stop Comments  
P.O. Box 1450  
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RE: Comments on Proposed Rules: "Changes to Practice for Continuing Applications, Requests for Continued Examination Practice, and Applications Containing Patentably Indistinct Claims" 71 Fed. Reg. 48 (January 3, 2006) RIN 0651-AB93

Dear Under Secretary Dudas:

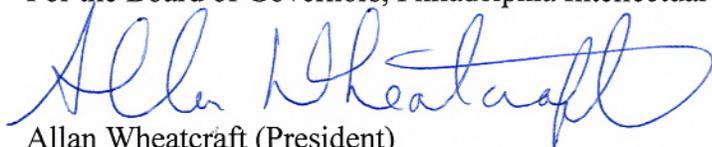
The Board of Governors of the Philadelphia Intellectual Property Law Association ("PIPLA") is providing the following comments to the currently *proposed* United States Patent and Trademark Office ("PTO") set of rules, "Changes to Practice for Continuing Applications, Requests for Continued Examination Practice, and Applications Containing Patentably Indistinct Claims" 71 Fed. Reg. 48 (January 3, 2006)(herein: "*The Proposed Continuation Rules*").

PIPLA acknowledges the PTO's laudable effort to adopt rules intended to improve patent quality in accordance with the USPTO 21<sup>st</sup> Century Strategic Plan. However, PIPLA has serious concerns with *The Proposed Continuation Rules*. The PTO proposal on continuations and a companion proposal on the examination of claims put forward significant changes to the existing rules for the examination of patent applications that we foresee would lead to undesirable results. Accordingly, PIPLA respectfully recommends against the adoption of *The Proposed Continuation Rules*.

As to specific comments, PIPLA endorses the reasoning and positions expressed in two sets of comments that were submitted by others last week. The first is the 19-page submission of the American Intellectual Property Law Association on April 24, 2006. The second is the 6-page submission of the Office of Advocacy of the U.S. Small Business Administration on April 27, 2006. Having reviewed these two submissions, we concur in their recommendations and hereby endorse them.

Respectfully submitted,

For the Board of Governors, Philadelphia Intellectual Property Law Association

A handwritten signature in blue ink, appearing to read "Allan Wheatcraft". The signature is fluid and cursive, with the first name "Allan" and the last name "Wheatcraft" clearly distinguishable.

Allan Wheatcraft (President)  
Philadelphia Intellectual Property Law Association