

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

In re:)
PTO Docket No.: PTO-P-2009-0021)
)
For: **Comments on Proposed Rules of**)
Practice Before the Board of Patent)
Appeals and Interferences in Ex Parte)
Appeals)
)
75 Fed. Reg. No. 219 (pp. 69828-69849))
(November 15, 2010))

**Comments on Proposed Rules of Practice Before the Board of Patent
Appeals and Interferences in Ex Parte Appeals**

The Honorable David J. Kappos
Under Secretary of Commerce for Intellectual Property
and Director of the United States Patent and Trademark Office (USPTO)
Mail Stop Interference
P.O. Box 1450
Alexandria, VA 22313-1450
Attention: Linda Horner, BPAI Rules

Dear Under Secretary Kappos:

Intellectual Ventures (IV) submits the following comments in response to the USPTO request contained in its notice of proposed rulemaking, 75 Fed. Reg. No. 219 (November 15, 2010).

We appreciate the opportunity to comment. We note that many suggestions made in publicly submitted comments have been adopted, and appreciate the ongoing efforts to improve USPTO processes for the benefit of the U.S. patent system. We support the proposed rules as revised, as well as the proposal to rescind the stayed (earlier) proposed final rules, and applaud the Office's responsiveness and detailed work in revising the rules in response to public comment.

Date: January 14, 2011

Respectfully submitted,
Intellectual Ventures, LLC



Matthew Rainey
Reg. No. 32,291
Vice President/Chief IP Policy Counsel
677 120th Avenue NE Suite 2A-248
Bellevue, Washington 98005