

# PUBLIC SUBMISSION

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**Docket:** PTO-P-2014-0004

Public Hearings on Proposed Changes to Require Identification of Attributable Owner

**Comment On:** PTO-P-2014-0004-0001

Rules of Practice; Identification of Attributable Owner: Public Hearings

**Document:** PTO-P-2014-0004-DRAFT-0003

Comment on FR Doc # 2014-03629

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## Submitter Information

**Name:** James Trueman

**Submitter's Representative:** Kristi Stathis

**Organization:** Ocean Tomo

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## General Comment

Ocean Tomo has played an active role in establishing markets for intellectual property transfer and monetization. Beginning with the first live multi-lot public auction of patents in 2006, we have actively promoted disclosure and transparency as a bedrock principle of price efficiency. Ocean Tomo supports USPTO Proposed Changes to Require Identification of Attributable Owner. We support such disclosure not only at the time of initial filing but also with any change of assignment. We concur with the proposition that such disclosure will further improve market efficiency for patent rights.

Intellectual property is taking up an increasingly large footprint on corporate balance sheets and is driving significant value for companies investing in obtaining IP through R&D. Changes such as those described here will produce dividends to owners of IP through increased awareness of such assets as well as reduce transaction costs.

Background Statement on the Firm:

Established in 2003, Ocean Tomo, LLC, is the Intellectual Capital Merchant Banc™ firm providing an industry leading array of financial products and services related to intangible assets. Ocean Tomo offerings include expert testimony, valuation, strategy, research, ratings, investments, risk management and transactions. Ocean Tomo assists clients – corporations, law firms, governments and institutional investors – in realizing Intellectual Capital Equity® value broadly defined.

Headquartered in Chicago, Ocean Tomo has offices in Greenwich, Houston and San Francisco. Subsidiaries of Ocean Tomo include: Ocean Tomo Risk Management, LLC; Ocean Tomo Asset Management, LLC; OTI Data Networks, LLC; Patent Marking, LLC; and Ocean Tomo Capital, LLC – publisher of the Ocean Tomo 300® Patent Index family. Ocean Tomo is the founder of the Intellectual Property Exchange International (IPXI), Inc., creator of the live public open cry auction marketplace for intellectual property, as well as the exclusive source for Ocean Tomo Ratings™.

Background Statement on the Submitter:

James A. Trueman is a Managing Director with Ocean Tomo, LLC responsible for the firm's Transactions Business Unit where Mr. Trueman advises clients on IP monetization opportunities, including Unit License Right™ offerings on the Intellectual Property Exchange International, Inc. and referral to ICAP Ocean Tomo auctions. Prior to joining Ocean Tomo, Mr. Trueman was Vice President of Business Development for Acacia Research Corporation, an Engagement Manager with McKinsey & Company and a Product Development Manager with Oracle Corporation. Mr. Trueman holds a MBA from The Wharton School and a Bachelor of Science from the University of California at Berkeley.