



14 January 2012

David J. Kappos, Director  
Azam Khan, Deputy Chief of Staff  
United States Patent and Trademark Office  
Mail Stop of Under Secretary and Director  
P.O. Box 1450  
Alexandria, VA 22313-1450  
satelliteoffices@uspto.gov

Re: Nationwide Workforce Program, docket no. PTO-C-2011-006

Dear Messrs. Kappos and Khan:

Santa Clara University with its Santa Clara University School of Law encourages the United States Patent and Trademarks Office (USPTO) to locate a satellite facility in the San Jose/Silicon Valley area. Santa Clara University believes that a Silicon Valley satellite office would best serve the interests of the America's patent and trademark system, the USPTO's user community and the interests of the USPTO employees.

Santa Clara University would support the satellite facility in numerous ways. Among other things, the university with its law school would be a source of potential examiners and other employees, and our courses and events would provide training and continuing education for office employees and help the office connect with the entrepreneur, inventor, legal practitioner and academic communities in the Silicon Valley.

### **About Santa Clara University**

Santa Clara University, located in the heart of Silicon Valley, is a major contributor to the Silicon Valley economic community. *U.S. News & World Report* ranks Santa Clara University 2nd among 127 master's universities located in the West, and *Forbes* magazine ranks Santa Clara University 67th on its list of America's Top Colleges.

Each year, Santa Clara University confers over 2,500 degrees at the undergraduate and graduate levels, including degrees in Accounting and Information Systems, Economics, Finance, Management and Information Systems, and Masters of Business Administration. Santa Clara University has an especially competitive Engineering program, offering degrees in

bioengineering, civil engineering, computer science and engineering, electrical engineering, mechanical engineering, web design and engineering, and general engineering. In 2010-11, Santa Clara University awarded over 200 undergraduate engineering degrees, 223 MS degrees in Engineering, and 9 Ph.D. degrees in Engineering.

### **The Bay Area Legal Academic Community**

There are six law schools in the Silicon Valley and surrounding Bay Area: Santa Clara University School of Law, Stanford Law School, U.C. Berkeley School of Law (Boalt Hall), U.C. Hastings College of the Law, University of San Francisco School of Law, and Golden Gate University School of Law. Because of the high interest in IP issues in our community, three of those schools are listed among the top 10 IP programs in the country by *U.S. News & World Reports* (in the most recent rankings: Berkeley #1, Stanford #2, SCU #8).

### **Santa Clara Law's High Tech Community**

Santa Clara Law's students, faculty and programs would provide substantial support to the satellite facility.

*Students:* Santa Clara Law can help the USPTO develop a pipeline of skilled and trained employees. We have a large number of talented, motivated, savvy and technologically knowledgeable students who would be excited by the opportunity to work at the satellite facility.

Typically, about 40% of incoming Santa Clara Law 1L students express an interest in high tech law. Of Santa Clara Law's 970 current students, 182 have a science or engineering background, 36 have MS degrees and 24 have PhDs in science or engineering. Many of these students are already members of the patent bar. Of the approximately 1,400 Santa Clara Law graduates receiving a Juris Doctorate in the past five years, more than a quarter have a technical background in either science or engineering. While many of our students would love to work for the USPTO, most prefer to stay in the Silicon Valley due to our entrepreneurial business climate, our good weather, our diversity and our high quality of living.

Santa Clara Law offers the only part-time law program in the Silicon Valley. Some of these students can work, full time or part time, at the USPTO during the day while taking law classes at night. Many of Santa Clara Law's part-time students have substantial Silicon Valley industry experience as engineers and business people. In addition, Santa Clara Law students could work at the satellite facility as either paid interns or unpaid externs for school credit, and many students would jump at the opportunity to get this experience. Further, Santa Clara Law would be eager to collaborate with the USPTO to develop more formal experiential learning programs that would make it even easier for students to work with the satellite facility or put them on the path to become patent examiners upon graduation.

The large number of qualified students, plus the range of technological expertise they possess, mean that the USPTO could find assistance with a broad range of technological arts, including some niche arts that are otherwise hard to recruit for.

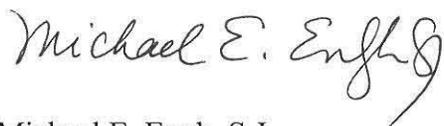
*Faculty:* Santa Clara Law's High Tech Law Institute has 32 full-time and adjunct high tech faculty members with expertise on every aspect of high tech law. Our patent curriculum is led by Prof. Colleen Chien, one of the leading patent scholars in the country, and other full-time faculty members teaching in our IP curriculum include Profs. Tyler Ochoa (who also directs our summer comparative IP program in Munich, Germany), Eric Goldman (who also directs our High Tech Law Institute) and Dorothy Glancy.

*Educational Programs:* Santa Clara Law regularly offers over 40 high tech courses that could provide continuing education to satellite facility employees. In addition, the law school—alone or in conjunction with co-sponsors that include other law schools, bar associations, non-profits and others—offers over two dozen high tech law-related public education and networking events each year, most of which free of charge or low cost. Not only would these events help satellite facility employees keep up-to-date on the latest legal developments, but they create opportunities for disparate Silicon Valley communities to gather, meet, share information and develop relationships.

In sum, bringing a satellite office of the USPTO to Silicon Valley would support all of the stated criteria of establishing satellite offices as put forth in the its "Request for Comments on Additional USPTO Satellite Offices for the Nationwide Workforce Program," and Santa Clara University and Santa Clara Law would directly contribute to each of those criteria in significant ways.

Thank you for your serious consideration of this endorsement to locate a branch patent office in the Silicon Valley. Santa Clara University is strongly committed to assisting in the successful operation of this office.

Sincerely,

A handwritten signature in black ink that reads "Michael E. Engh". The signature is written in a cursive style with a large, sweeping flourish at the end.

Michael E. Engh, S.J.  
President

cc: Honorable Mike Honda  
Honorable Zoe Lofgren  
Honorable Anna Eshoo