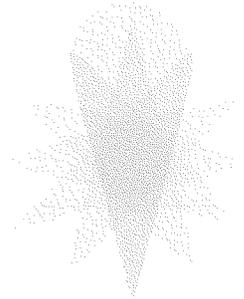


26 January 2012

Submitted electronically via [satelliteoffices@uspto.gov](mailto:satelliteoffices@uspto.gov)

Mr. Azam Khan  
Deputy Chief of Staff  
U.S. Patent and Trademark Office  
Mail Stop Office of Under Secretary and Director  
PO Box 1450  
Alexandria, VA, 22313-1450



RE: Nationwide Workforce Program, Docket Number PTO-C-2011-0066, Request for Comments on Additional USPTO Satellite Offices for the Nationwide Workforce Program

Dear Mr. Khan:

Juniper Networks is pleased to submit these comments in reference to the United States Patent and Trademark Office's ("USPTO") request for comments regarding additional USPTO satellite offices. As a customer of the USPTO, we believe that the knowledge base and professional demographics of the Silicon Valley area of Northern California make it the ideal location for a USPTO office. It is our recommendation, therefore, that the USPTO open one such satellite office in Silicon Valley.

By way of background, Juniper Networks is a private corporation based in Sunnyvale, California. We offer a high-performance network infrastructure that helps service providers, enterprises, Federal agencies, and other public sector organizations deploy networks that are open, scalable, simple, secure, and automated. Juniper's portfolio includes software, silicon, and systems for routing, switching, and security, including for remote access, data center architectures, and cloud computing solutions. The very nature of our business demands the legal protections for high-technology innovations that the patent system grants.

It should, therefore, come as no surprise that Juniper is an avid customer of the USPTO. As of January 24, 2012, the USPTO had awarded 1138 patents listing Juniper as the assignee. In addition, the USPTO website shows that 465 patent applications have been published as of the same date with Juniper named as the assignee.

It is with this background that Juniper recommends that the USPTO open one of its satellite offices in the Silicon Valley area of Northern California. We believe that a Silicon Valley office would be of immense benefit not only to the USPTO but also to the inventor community and address herein the specific factors that the USPTO identifies in its request for comments:

1. Increase outreach activities to better connect patent filers and innovators with the USPTO, including the number of patent filings and grants by the city/region as well as other information that provides insight into the region's innovation activity.

This factor weighs heavily in favor of the USPTO opening an office in Silicon Valley because USPTO statistics indicate that USPTO outreach in the region would reach a high population of inventors. In fact, inventors in Silicon Valley annually receive more patents than those in any other region of the country on a consistent basis. The Patent Technology Monitoring Team's report for 2010 shows that inventors in the Metropolitan Statistical Area consisting of San Jose-Sunnyvale-Santa Clara (the Metropolitan Statistical Area that most closely defines Silicon Valley) earned 10,074 patents in 2010, almost 60% more than were awarded to inventors in the next highest region.

2. Enhance patent examiner retention, including quality of life indicators such as average household income, cost of living factors, and other factors related to employee retention.

Silicon Valley ranks as one of the most desirable places to live in the United States. The area possesses cultural and artistic diversity, a wide-ranging public transportation network, excellent public schools, and a rich geography.

3. Improve recruitment of patent examiners, including data on employment rates and other economic factors in the area, science and technology professionals, as well as legal professionals in the workforce and other related information.

Silicon Valley would present a rich pool of candidates from which to recruit patent examiners. The region boasts world-class universities and research facilities that train engineers and scientists at all levels, from undergraduate through post-doctoral research. These individuals would be premier candidates for examiner positions within the USPTO. The biotechnology and high-tech companies in the area also employ thousands of scientists and engineers that might seek to work for the USPTO. In addition, the need for patent work in Silicon Valley as a result of its status as an innovation hotbed has led to a regional talent pool of judges, law firms, attorneys, and other professionals who are skilled in patent law and would facilitate the USPTO's important work.

4. Decrease the number of patent applications awaiting examination.

Considering that Silicon Valley is one of the most innovative regions in the World and is the source of a significant number of patent applications, locating an office there would contribute to a significant decrease in the patent backlog. Patent examiners would be in close proximity to patent applicants and inventors, making it possible for meetings between the sides to be arranged on short notice, thereby speeding up the examination process.

5. Improve the quality of patent examination.

The combination of science and engineering experts, universities, and research facilities in Silicon Valley will improve the quality of patent examinations. USPTO examiners located in Silicon Valley will have easy access to the inventors, attorneys, and other professionals that underlie patent applications and, as such, will be able to conduct more thorough and accurate examinations of the applications they review.

6. The presence of universities with strong engineering programs, the presence of research facilities, the economic impact to the region, and any other economic factors.

As stated above, Silicon Valley is home to numerous universities with world-class engineering programs that would be useful resources for the USPTO, both in terms of personnel and technical knowledge. In addition, two National Laboratories operating under the purview of the U.S. Department of Energy, Lawrence Berkeley National Laboratory and Lawrence Livermore National Laboratory, are located in the area and also could benefit the USPTO.

For these reasons, Juniper Networks respectfully recommends that the USPTO open one of its satellite offices in Silicon Valley. Thank you for your consideration of our views. Should you have any questions regarding this submission, please feel free to contact me at [mgaynor@juniper.net](mailto:mgaynor@juniper.net) or (408) 745-2384.

Sincerely,

A handwritten signature in black ink, appearing to read 'Mitchell L. Gaynor', with a long horizontal flourish extending to the right.

Mitchell L. Gaynor  
Executive Vice President, General Counsel, and Secretary