

Bob Buckhorn
Mayor

January 25, 2012

The Honorable David Kappos
Under Secretary for Intellectual Property
U.S. Department of Commerce
445 12th Street, SW
Washington, D.C. 20554

RE: PTO-C-2011-0066 Comments on Additional USPTO Satellite Office for the Nationwide Workforce Program

Dear Under Secretary Kappos:

Based on the objective criteria put forth by the USPTO, the Tampa Bay region is an ideal location for a satellite office. The region is a recognized technology hub for the Southeast, particularly with respect to life sciences, electronics, defense and software development. The University of South Florida (USF) is a primary catalyst for technology and a multi-billion dollar driver of commerce in the Tampa Bay region. USF is a prolific customer of the USPTO, ranking at the top of universities world-wide for patents granted.¹ USF is also home to the National Academy of Inventors, a rapidly growing professional network for academic inventors with chapters across the United States and abroad.

Florida boasts top research universities with strong engineering programs.² Patent examiners living in the Tampa Bay region would also have frequent opportunities to collaborate with internationally acclaimed research institutes.³ A satellite office would enhance connections with an already vibrant intellectual property community and ignite further research and productivity.

The Tampa Bay region is well-suited to meet the travel needs of a satellite office. Tampa International Airport connects easily to Washington, D.C. with up to 16 daily departures to Washington-Reagan, Washington-Dulles and Baltimore-Washington airports. Tampa International offers connections to the Gulf of Mexico states and provides excellent gateway service to Latin America and Mexico.

¹ USF ranks 9th as one of 14 universities among 300 organizations worldwide that earned the most U.S. patents in 2010 according to the Intellectual Property Owners Association.

² Those universities include University of Florida, University of South Florida, University of Central Florida, Florida State University, Florida Agricultural and Mechanical University, Florida International University, Florida Atlantic University, Florida Institute of Technology, University of Miami and Embry Riddle Aeronautical University.

³ Research institutions include Charles Stark Draper Laboratory, Florida Institute for Human and Machine Cognition, H. Lee Moffitt Cancer Center and Research Institute, Mayo Clinic Florida, Max Planck Florida Institute, Oregon Health Sciences, Sanford-Burnham Medical Research Institute, Scripps Research Institute, SRI International, Torrey Pines Institute for Molecular Studies, and a robust medical devices industry.

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Recognized as “America’s Favorite Airport,” Tampa International recently ranked sixth in a survey of the world’s best airports for customer service and ease of use.

Creativity and inspiration thrives when concerns such as cost of living and quality of life are resolved. The Tampa Bay region remains an extraordinarily affordable place to live for housing, utilities, food and other grocery items, transportation, health care and other goods.⁴ The region ranks well above the national average in affordability over the last three years.

The desirability of working in Florida is no surprise to the nearly seventy (70) patent examiners already telecommuting from Florida.⁵ With the recent approval from GSA to establish the patent examiner’s duty station at their home,⁶ Florida-based patent examiners would more likely find long-term USPTO careers attractive. This enhanced stability and reduced examiner turnover would help the USPTO focus on reducing the existing patent application backlog and improve the quality of patent examination with experienced employees.

The Tampa Bay region offers various platforms for the recruitment of qualified patent examiners. An office in the Tampa Bay region would not only have access to graduates from the University of South Florida, with more than 47,000 enrolled students, but also to Florida’s eight other universities with engineering programs. The USPTO could widen its candidate search to include graduates from universities in neighboring southern states, with more than 900,000 enrolled students. In 2010 alone, the region awarded 11,971 Bachelors, 5,621 Masters and 1,366 Ph.D. degrees in Engineering, with Florida accounting for more than one-third of them⁷. A Tampa office could also benefit from the highly skilled and experienced NASA engineers from the retired Shuttle program living in our surrounding cities.

Once patent examiners are established in our region, those who wish to further their education have numerous options. In addition to many programs at the University of South Florida and the University of Tampa, there are opportunities for patent examiners to obtain law degrees. The Stetson University College of Law in Tampa offers a part-time Juris Doctor degree program with evening and weekend classes. In addition, the University of Florida’s College of Law is within driving distance, as well as the Florida A&M University College of Law’s part-time degree program in Orlando.

The USPTO’s implementation of a decentralized, telework model for its operations would succeed in the Tampa Bay region. Tampa is a major node on the Florida LambdaRail, LLC (FLR), which is complementary to the National LambdaRail (NLR) initiative, a national high-speed network initiative for research universities and technology companies. Our superior telecommuting infrastructure would

⁴ 2011 (Q3) ACCRA Cost of Living Index.

⁵ USPTO Office of the CAO reports 69 patent examiners with Florida residences as of January 17, 2012.

⁶ Per Robert Buden, POPA president as of January 17, 2012.

⁷ Source: American Society for Engineering Education (<http://profiles.asee.org/>)

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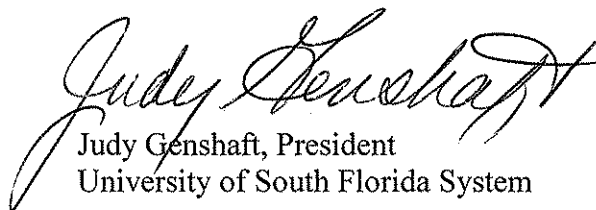
assist in the quality and processing of patent examinations helping to decrease the number of applications awaiting review.

Establishing a satellite office in the Tampa Bay region would provide a stable workforce for the USPTO and offer valuable connections to the entities vital for patent grants. Together with a superlative quality of life, a distinctive telecommuting infrastructure and easy access to Washington, D.C., the Tampa Bay region is an ideal location for the next USPTO satellite office.

Sincerely,



Bob Buckhorn, Mayor
City of Tampa



Judy Genshaft, President
University of South Florida System