

Cover email

From: Michael Bergman [e-mail address redacted]
Sent: Monday, January 30, 2012 7:58 PM
To: SatelliteOffices
Cc: [e-mail address redacted]
Subject: 3 emails - part 1 of 3** PTO-C-2011-0066; Nationwide Workforce Program; Copies of Letters Submitted by Stakeholders to the USPTO

Kindly Acknowledge Receipt by Return E-Mail

Mr. Azam Khan
Deputy Chief of Staff
United States Patent and Trademark Office
Mail Stop Office of Undersecretary and Director
P. O. Box 1450
Alexandria, VA 22313-1450

satelliteoffices@uspto.gov

Dear Mr. Khan,

Thank you for mentioning that some submissions of letters by stakeholders to the USPTO were submitted directly to you at your email address (azam.khan@uspto.gov) instead of the official email address (satelliteoffices@uspto.gov) to which comments about the USPTO satellite offices are to be sent. Attached are copies of letters that have been sent to our organization that we are now sending to you to ensure that the letters are included as publicly available documents as part of the open comments submissions.

Thank you for your consideration.

Best regards,

Michael Bergman
Member of the Boston Patent Law Association
[phone redacted]

[e-mail address redacted]



January 26, 2012

Via Email to satelliteoffices@uspto.gov

The Honorable David J. Kappos
Under Secretary of Commerce for Intellectual Property and
Director of the United States Patent and Trademark Office

United States Patent and Trademark Office
Mail Stop Office of Undersecretary and Director
PO Box 1450
Alexandria, VA 22313-1450

Re: PTO-C-2011-0066; Nationwide Workforce Program; **Boston Satellite Office**

Dear Under Secretary Kappos:

I am writing on behalf of Velcro Group Corporation ('VGC') to urge the United States Patent and Trademark Office (USPTO) to select the Boston area as the site for a satellite office and to provide the USPTO with information in response to the *Request for Comments on Additional USPTO Satellite Offices for the Nationwide Workforce Program*, 76 Fed. Reg. 73601 (Nov. 29, 2011).

We are well-located and aptly knowledgeable and experienced to provide you with information about the Boston area in support of the purposes of establishing satellite offices specified in the request. From our offices here in southern New Hampshire, VGC manages a worldwide patent portfolio that has evolved from the earliest patents on the pioneering inventions of hook and loop fasteners and the machines and methods for manufacture of fasteners, including US Patent no. 2,717,437, issued Sept. 13, 1955, "VELVET TYPE FABRIC AND METHOD OF PRODUCING SAME," through generations of innovation and patenting, to a robust current patent portfolio spanning 13 countries, including 170 outstanding active issued patents in the United States and 40 applications pending before the USPTO. We engage a Boston based patent law firm to provide assistance on applications pending in the USPTO.

You should also note that VGC is just one of the many, many companies in this area that understand, use and value patents and that would be well-served by a Boston area satellite office. USPTO data shows that New England is a leader nationally, with over 32,000 patents and 420,000 patent applications. As the regional hub of New England, a Boston satellite office will more easily and efficiently serve these and other future patentees and applicants throughout the nearby surrounding New England states. In particular, a Boston area satellite office would allow



VGC and the full range of individual inventors, SMEs and global enterprises throughout New England and our patent attorneys to better and more efficiently communicate with US patent examiners and to provide us all with a more convenient and compelling opportunity to participate in USPTO outreach activities.

Furthermore, based on our experience and familiarity with the hiring pool in this area – which is fed by both recent graduates of the many prestigious Massachusetts and New England academic institutions and experienced scientific, technical and legal professionals -- we believe that we will all benefit by the USPTO's enhanced ability to hire and retain examiners, and to thereby improve patent quality, as a consequence of locating one of its satellite offices in the Boston area.

In short, based on our decades of experience as an innovative and patent-focused enterprise and our knowledge of this region, we enthusiastically support a Boston area location as best serving the New England patent community and the USPTO's purposes for establishing a satellite office. We urge you to select the Boston area as the site for one of the next two USPTO satellite offices.

Thank you for your consideration,

A handwritten signature in black ink, appearing to read 'Mark A. Clarner', written in a cursive style.

Mark A. Clarner - USPTO Reg. No. 68,105

Intellectual Property Manager, Velcro Group Corporation

cc: Robert E. Jauron – General Counsel, VGC

January 27, 2012

David J. Kappos,
Under Secretary of Commerce for Intellectual
Property and Director of the United States
Patent and Trademark Office
Mail Stop Office of Under Secretary and Director
P.O. Box 1450
Alexandria, VA 22313-1450
satelliteoffices@uspto.gov

RE: PTO-C-2011-0066; Nationwide Workforce Program

Dear Mr. Kappos:

It is with great enthusiasm that Boston area law firms are jointly writing this letter to you to encourage the United States Patent and Trademark Office (USPTO) to establish a satellite office in Massachusetts pursuant to Section 23 of the America Invents Act.

A regional satellite office of the USPTO in Massachusetts would have access to seasoned engineers, scientists, and patent professionals who can become patent examiners. Further, Boston has renowned law schools providing day and evening programs that offer intellectual property courses. Having a satellite office in the greater Boston area would enable examiners to take such courses and allow the USPTO to recruit incoming talented professionals from such programs.

The New England area is proud of its reputation for employee loyalty, and such loyalty would help the USPTO achieve its goal to increase patent examiner retention. The Boston area law firms believe that, as the patent examiners in the New England regional satellite office become primary and supervisory examiners, the current high quality of patent examination would be maintained or even improved and with greater bandwidth.

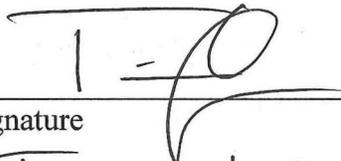
The greater Boston area has a world-class public transportation system, which includes a major airport, regional airports, commuter rail, and bus and subway systems. This public transportation system has contributed to the growth in number and national stature of the Boston area hospitals, science and engineering companies, and law firms. Moreover, the convenience of travel between Alexandria and Boston would lend itself well to travel by satellite office examiners for training in Alexandria or travel by supervisory examiners to the regional satellite office in Massachusetts.

Massachusetts law firms are collegial and support a number of prominent organizations that provide continuing legal education seminars in diverse areas of intellectual property. Examples of such organizations include: The Boston Patent Law Association, Boston Bar Association, Massachusetts Bar Association, Boston IP Inn of Court, and Massachusetts Continuing Legal Education Corporation. Dozens of seminars each year would be available to examiners of a regional satellite office in Massachusetts.

Mr. David J. Kappos

While the undersigned law firms are jointly signing this letter to you, we note that we do so on behalf of many other law firms, sole practitioners, and in-house counsel who collectively serve the needs of a vast number of stakeholders in the USPTO.

Respectfully submitted,

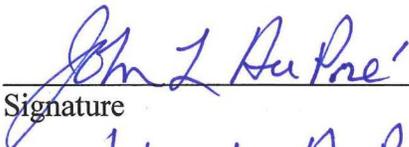


Signature
TIMOTHY J. OYER

Name (print)
PRESIDENT

Title
WOLF, GREENFIELD & SACIE, P.C.

Organization

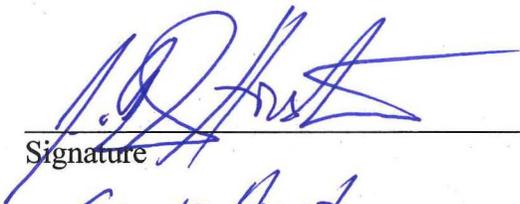


Signature
John L. DuPré

Name (print)
President

Title
Hamilton, Brook, Smith & Reynolds, P.C.

Organization

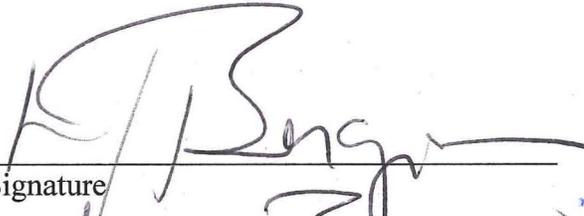


Signature
Grant Austin

Name (print)
Partner

Title
Houston Eliseeva LLP

Organization



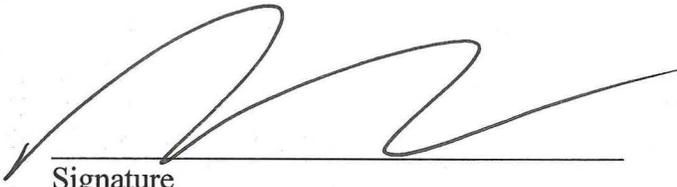
Signature
MICHAEL BERGMAN

Name (print)
FOUNDING PARTNER

Title
BERGMAN & SONG LLP

Organization

Mr. David J. Kappos



Signature

Mike McGURK

Name (print)

Managing Partner, Cambridge Office

Title

Finnegan

Organization



Signature

DAVID P. ROSENBLATT

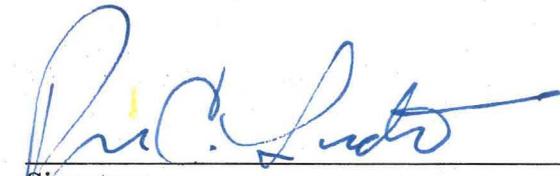
Name (print)

Managing Partner

Title

Burns + Levinson, LLP

Organization



Signature

PETER LANDO

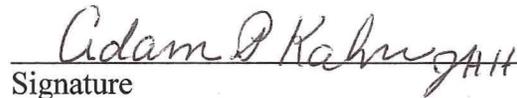
Name (print)

CO-MANAGING PARTNER

Title

LANDO & ANASTASI, LLP

Organization



Signature

Adam P Kahn

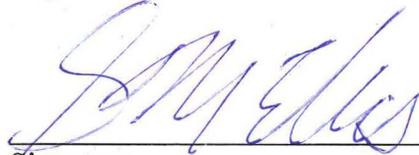
Name (print)

Co-Managing Partner

Title

Foley Hoag LLP

Organization



Signature

Steve Ellis

Name (print)

Boston Office Head

Title

Proskaver Rose LLP

Organization



Signature

Deborah J Manus

Name (print)

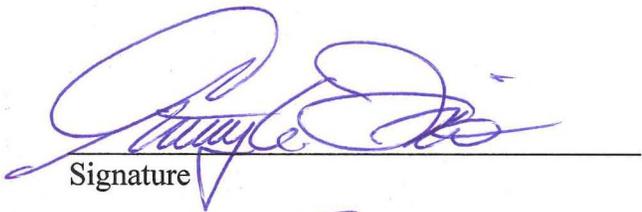
Co-Managing Partner

Title

Nutter, Mc Clellan + Fish LLP

Organization

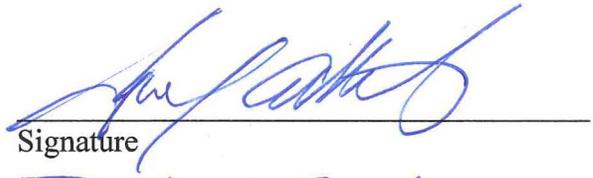
Mr. David J. Kappos


Signature

ANTHONY A. FROIO
Name (print)

REGIONAL MANAGING PARTNER
Title

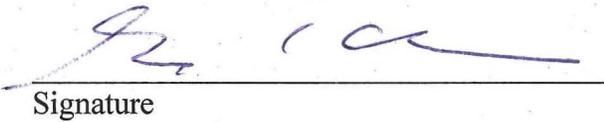
ROBINS KAPLAN MILLER & CRENSHAW LLP
Organization


Signature

Timothy A. French
Name (print)

Managing Principal Boston
Title

Fish & Richardson P.C.
Organization


Signature

STEVEN C. BROWNE
Name (print)

MANAGING PARTNER - BOSTON OFFICE
Title

Bingham McCutchen LLP
Organization


Signature

Erik Paul Belt
Name (print)

PARTNER
Title

McCarter & English LLP
Organization


Signature

ROBERT L. KANN
Name (print)

MANAGING PARTNER
Title

SUSTEIN KANN MURPHY &
Organization
Timbers LLP


Signature

Leslie Meyer-Leon
Name (print)

President
Title

IP Legal Strategies Group P.C.
Organization



January 27, 2012

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

Dear Under Secretary Kappos,

I am writing to you today to strongly urge you to select Massachusetts for one of the new satellite offices for the U.S. Patent and Trademark Office.

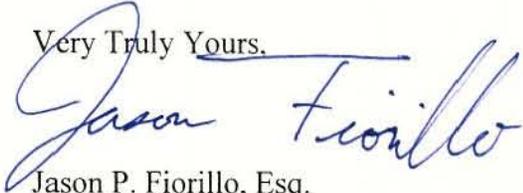
As you may know, Analog Devices is one of the preeminent analog and mixed signal semiconductor manufacturers in the world. Our integrated circuits play a fundamental role in converting, conditioning and processing real-world phenomena such as light, sound, temperature, motion and pressure into electrical signals to be used in a wide array of electronic equipment. We have more than 10,000 distinct products and 60,000 customers worldwide. Our products are used, for example, in industrial automation, cellular base stations, automotive safety systems, military electronics, healthcare equipment and hundreds of other fields. Through tireless innovation, we push the boundaries of technological performance. Perhaps this is why CERN utilizes more than 100,000 of our Analog to Digital Converters in the Large Hadron Collider, and why our demodulating logarithmic amplifiers are being used to detect neutrinos which penetrate 1,500 meters below the surface of the ice covering the South Pole. In sum, Analog Devices is an incredibly innovative company.

Like many other successful high-tech companies, Analog Devices is an MIT startup. We were founded in Cambridge roughly 46 years ago, and have always been a Massachusetts corporation. Two-thirds of our North American workforce, or roughly 2,200 employees, work in offices just outside of Boston. We also are quite active in protecting our employees' innovations. As you may know, we have more than 1,700 issued U.S. Patents, more than 700 pending patent applications, and dozens of registered trademarks. In fact, our rate of patent submission is increasing. And, although our activities are impressive on their own, we are but one of many high-tech companies in this area that would benefit greatly from the ability to interact directly with the USPTO on a daily basis.

Through this letter, allow us to add our strong support to the requests you've already received from leading high-tech corporations and educational institutions in support of Massachusetts as the location for the next satellite office for the USPTO.

Thank you for your consideration. If you'd like to discuss this further, via telephone or in person, please do not hesitate to call.

Very Truly Yours,

A handwritten signature in blue ink that reads "Jason Fiorillo". The signature is fluid and cursive, with a horizontal line extending from the end of the name.

Jason P. Fiorillo, Esq.

Senior Intellectual Property Counsel and Assistant Secretary

cc: Senator Kerry
Senator Brown
Congressman Olver
Congressman Neal
Congressman McGovern
Congressman Frank
Congresswoman Tsongas
Congressman Tierney
Congressman Markey
Congressman Capuano
Congressman Lynch
Congressman Keating
Governor Patrick



Mr. Azam Khan
Deputy Chief of Staff
United States Patent and Trademark Office
Mail Stop Office of Undersecretary and Director
PO Box 1450
Alexandria, VA 22313-1450

RE: PTO-C-2011-0066; Nationwide Workforce Program

Dear Mr. Khan:

WEST: Advancing Women in the Business of Science and Technology, located in Cambridge, Massachusetts encourages the United States Patent and Trademark Office (USPTO) to establish a satellite office in the Massachusetts area.

Launched in 2000, WEST provides a forum for women in science and technology industries to network and share information about career advancement and skill development. Uniquely tied to this highly educated, influential community, the WEST leadership has long provided a supportive environment for mid-career women in these vital sectors, allowing them a unique opportunity to acquire the skills necessary to become business leaders in their fields.

WEST offers a rich and thriving community that provides support, guidance, and professional development for professionals in science, engineering and technology industries. Members can leverage a broad array of workshops and panels that include advice regarding career advancement, alternate careers options, professional skill building, and exposure to entrepreneurial thinking. Calibrated to arm our members with the skills they need in today's competitive, face-paced work environment, the WEST organization works tirelessly to bring the most up-to-date information to the group. Through education, mentorship, and engaged networking, we strive to serve our diverse community so our members can achieve their full potential.

WEST encourages women to develop entrepreneurial management thinking, educated risk taking, creative problem solving, and inspirational, supportive leadership for their teams/organizations/businesses. WEST members work at biotechnology, pharmaceutical, and IT companies as well as in organizations that support and collaborate with these industries such as professional service firms, financial institutions, and non-profit groups.

WEST is an example of the culture of science and engineering education that is prominent in New England. Moreover, I can attest to the science and engineering talent that can be found in Massachusetts, and would gladly work with the USPTO in placing enthusiastic and committed scientists and engineers in patent examiner positions.

In conclusion, WEST would welcome a regional office of the USPTO into the local science and engineering community, as would our extensive network of educational and business supporters.

Respectfully submitted,

Ilene Fischer
WEST Executive Director

Friday, January 27, 2012

Azam Khan
Deputy Chief of Staff
United States Patent & Trademark Office
Mail Stop Office of Undersecretary and Director
P.O. Box 1450
Alexandria, VA 22313-1450

**Re: Docket Number PTO-C-2011-0066
Nationwide Workforce Program**

Dear Sir,

MassChallenge is advocating that one of the two remaining satellite patent offices pursuant to the Federal Register's solicitation under the Docket No. PTO-C-2011-0060 be located in the Greater Boston area.

There are two compelling reasons that drive our rationale for this support. Firstly, Massachusetts received \$268 million from the Small Business Innovation Research (i.e. SBIR) program in 2009, which was by far the most money per capita than any other state. Concurrently, Massachusetts is the leader in per capita patents granted to private companies in 2009 by the U.S. Patent and Trademark Offices at 561 per million residents. These metrics buttress the case that Boston is the center of the research and development universe for the East Coast, which would geographically balance your initial selection of Detroit, Michigan.

There are a number of patent law firms in the New England region, which are mostly located in the Greater Boston area. The satellite office would accelerate the time in which provisional or permanent patents get processed and reduce the backlog in the current Alexandria, Virginia central office. Obviously, the Boston/Cambridge educational axis brings with it world class institutions for higher learning and cutting edge research.

With the SBIR program and prolific patent volume in Massachusetts, we think the Boston area would be an excellent fit as a satellite location due to the fact that it would mitigate and reduce the amount of time it takes to process patent filings. I believe SBANE has offered a few compelling reasons why the U.S. Patent Office should strongly consider the Boston area as one of its remaining satellite offices. Thank you for your consideration.

Sincerely,



John Harthorne
Founder & CEO

January 30, 2012

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

Dear Under Secretary Kappos:

I am writing to you on behalf of EMC Corporation ("EMC") to encourage the United States Patent and Trademark Office ("USPTO") to open a satellite office in Boston. EMC is a world leader in information infrastructure technology and solutions and is the largest Massachusetts-based technology company with 2011 revenues of approximately \$20 billion. Further, EMC employs over 53,000 employees worldwide and is the owner of over 2,500 patents, with many more pending at the USPTO.

We at EMC believe that Boston would be an ideal setting for a satellite office. Massachusetts is one of the largest centers for technological innovation in the United States and is the home to many highly successful innovative companies. Massachusetts also has one of the largest clusters of colleges, universities, and hospitals that provide higher education, advanced degrees, and post-doctoral studies in all areas of technology. Massachusetts has the highest per-capita number of patent professionals outside of the Arlington, VA area at over 35 per 158,000 people. Additionally, New England has almost 3,000 patent professionals. Based on 2009 data, Massachusetts is also the leader in per capita patents granted to private companies by the USPTO at 561 per million residents.

Boston and its suburbs are great places to live, with abundant recreational, cultural, educational and entertainment opportunities. The goal of retaining patent examiners will be well served especially when the opportunities for professional development in such a diverse and intellectually stimulating environment are considered.

In view of the available benefits to the public and the USPTO described above, please give careful consideration to Boston as the location of a New England satellite office of the USPTO.

Sincerely,



Krish Gupta
Senior Vice President & Deputy General Counsel

KG/mz



COMMONWEALTH OF MASSACHUSETTS
MASSACHUSETTS SENATE
STATE HOUSE, BOSTON, MA 02133-1053

SENATOR
BARRY R. FINEGOLD
SECOND ESSEX AND MIDDLESEX DISTRICT

ROOM 416B
TEL. (617) 722-1612
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[BARRY.FINEGOLD@MASENATE.GOV](mailto:Barry.Finegold@MASenate.gov)
[WWW.MASENATE.GOV](http://www.MASenate.gov)

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January 30, 2012

Azam Khan
Deputy Chief of Staff
United States Patent and Trademark Office
Mail Stop Office of Undersecretary and Director
PO Box 1450
Alexandria, VA 22313-1450

Re: Docket number PTO-C-2011-0066 and the "Nationwide Workforce Program"

Dear Mr. Khan:

I write to encourage the United States Patent and Trademark Office (USPTO) to select Massachusetts as one of three new locations for a satellite office. Establishing a USPTO satellite office in Massachusetts would undoubtedly create better connections with patent applicants, innovators, and legal professionals. It would also aid in decreasing the backlog of patent applications in the New England area.

Massachusetts is one of the largest centers for intellectual property as well as one of the biggest homes to colleges, universities, and hospitals that provide higher education, advanced degrees, and post-doctoral studies in all areas of intellectual property. Over a dozen world-renowned academic institutions for science and engineering are located in the Boston and Central Massachusetts areas, and many more within New England.

Furthermore, Massachusetts is a world leader in high tech, biotechnology, nanotechnology, and pharmaceutical research. As you know, these industries disproportionately rely on the patent system and would benefit from a USPTO satellite office in the state.

Finally, Massachusetts has a uniquely high diversity and concentration of IP-related sciences and technologies, such as biological sciences, pharmaceuticals, nanotechnology, clean energy, software, medical devices, electrical engineering, optics, communication, and numerous others.



JOHN R. CONNOLLY
BOSTON CITY COUNCILLOR AT-LARGE

January 30, 2012

Mr. Azam Khan
Deputy Chief of Staff
United States Patent and Trademark Office
Mail Stop Office of Undersecretary and Director
P.O. Box 1450
Alexandria, VA 22313-1450

RE: National Workforce Program – PTO-C-2011-0066

Dear Mr. Khan:

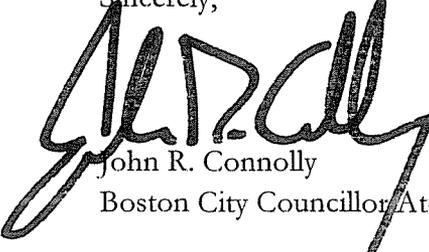
I am writing in strong support of the United States Patent and Trademark Office (USPTO) selecting Massachusetts as one of its three locations to establish a satellite office per Section 23 of the *America Invents Act*.

The Greater Boston area would be ideal for such an office with an already well-established and thriving community of patent professionals. As you know, Massachusetts has an impressive network of high tech, biotechnology, nanotechnology, and pharmaceutical companies along with our world-class colleges, universities, and hospitals.

Much of our region's economic engine is familiar with and relies on interaction with the USPTO. Having a satellite office in Massachusetts would further encourage the formation of new industries and start-ups and create long-term jobs. Our innovation economy would greatly benefit from a regional office in our Commonwealth, and I am similarly confident that the USPTO would find a rich pool of talent in our highly skilled workforce.

I know that Boston would welcome a USPTO satellite office and I strongly urge you to consider our city and our state as a candidate. Thank you for your time and attention to this matter, and please do not hesitate to contact me directly with any questions you might have.

Sincerely,



John R. Connolly
Boston City Councillor At-Large

Boston City Hall - One City Hall Square - Boston, MA 02201
John.R.Connolly@cityofboston.gov

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****Twenty-five years or more

***Twenty years or more

**Fifteen years or more

* Ten years or more

* Five years or more

January 25, 2012

Azam Khan
Deputy Chief of Staff
United States Patent & Trademark Office
Mail Stop Office of Undersecretary and Director
PO Box 1450
Alexandria, VA 22313-1450

RE: PTO-C-2011-0066; the Nationwide Workforce Program

Dear Mr. Khan,

Every month, the MIT Enterprise Forum of Cambridge works with entrepreneurs who are in the various stages of protecting intellectual property in order to bring it to the commercial market. Our legal sponsors also have significant practices devoted to intellectual property and routinely bring in new attorneys and patent agents in order to provide the local entrepreneurs with the best advice. MIT Enterprise Forum of Cambridge programs are steeped in providing our audience with guidance and advice on understanding and accessing the patent and trademark system.

Intellectual property is at the heart of the innovation economy here in Massachusetts and New England. It is not concentrated in one industry, but covers a diversity of technologies. This diversity provides a unique opportunity to train and retain patent examiners – things will never be boring! In return, the Patent Office will have a unique opportunity to work with the local entrepreneurial ecosystem to better improve the patent and trademark process, and even recruit examiners from the many legal and technology-trained individuals in the region.

We urge you to consider Massachusetts as the location for the next satellite USPTO office.

Sincerely,



Trish Fleming
Executive Director



MASS
TECHNOLOGY
LEADERSHIP
COUNCIL

Mass Technology Leadership Council, Inc.
20 Mall Road, Suite 151, Burlington, MA 01803
781-993-9000, www.masstlc.org

January 18, 2012

Mr. Azam Kahn
Deputy Chief of Staff
United States Patent and Trademark Office
Mail Stop Office of Undersecretary and Director
PO Box 1450
Alexandria, VA 22313-1450

Ref: PTO-C-2011-0066; Nationwide Workforce Program

Dear Deputy Chief of Staff Khan:

Section 23 of the *America Invents Act* (AIA) of 2011 requires the Patent and Trademark Office (USPTO) to establish three satellite offices to carry out its responsibilities. As the President and Chief Executive Officer of a business association that addresses the critical leadership issues of innovative technology and technology-enabled companies, I am writing to encourage the USPTO to select Massachusetts as one of the locations for a regional satellite office.

The Mass Technology Leadership Council, Inc. (MasstLC) is a business association dedicated to fostering entrepreneurship and promoting the success of companies that develop and deploy technology across industry sectors. As the only business association that addresses the critical leadership issues of innovative technology and technology-enabled companies, we see first-hand the power of the intellectual property developed in Massachusetts. Massachusetts consistently ranks first or second in the number of patents per capita (60 patents per 100,000 people in 2008). A locally-based USPTO office would provide for more timely and high-quality examinations for the large number of applications submitted by the region's highly diverse technology and technology-enabled companies.

Massachusetts is home to many companies that develop and deploy innovative technology across highly diverse industry sectors, such as software, big data/analytics, cloud/network computing, digital gaming, mobile communications, robotics, clean energy, health care, life sciences, and others. As you know, these industries rely heavily on the patent system. Massachusetts is also home for world-class universities, colleges and medical research centers. The USPTO would certainly benefit from the close locally-based connections that a Massachusetts-based regional satellite office would create.

I strongly urge the USPTO to consider Massachusetts as a location for one of its new regional satellite offices.

Sincerely,

Thomas Hopcroft
President & CEO



January 17, 2012

Azam Khan
Deputy Chief of Staff
United States Patent and Trademark Office
Mail Stop Office of Undersecretary and Director
PO Box 1450
Alexandria, VA 22313-1450

main: 617 • 674 • 5100 fax: 617 • 674 • 5101

Massachusetts Biotechnology Council
Ninth Floor, One Cambridge Center
Cambridge, MA 02142

Dear Deputy Chief of Staff Khan,

I am writing in regards to docket number PTO-C-2011-0066, the request for comments on additional United States Patent and Trademark Office Satellite Offices for the Nationwide Workforce Program. I am writing on behalf of MassBio and our 600 member organizations to encourage USPTO to select Massachusetts as one of the locations for a satellite office.

Massachusetts is a world leader in high tech, biotechnology, nanotechnology, and pharmaceutical research. Massachusetts is one of the largest centers for intellectual property and home to over a dozen world-renowned academic institutions for science and engineering.

Massachusetts is a hub of innovative ideas and research. In 2010, NIH basic research funding in Massachusetts ranked only behind California. On a NIH-funding per capita basis, Massachusetts far exceeded other leading NIH-recipient states and is home to the Top 5 NIH-funded research hospitals in the U.S. Massachusetts companies in 2005 raised the 2nd highest percentage of venture capital investments in the country at 10.3% and in 2010 Massachusetts companies received 23.1% of all U.S. VC biotech investment – an all-time high. These are the institutions and organizations that are turning out patent-worthy technologies and ideas.

Massachusetts biotechnology and life sciences companies are centered on innovations designed to help meet unmet medical needs. **The life sciences community relies on the patent system as it creates new life-saving treatments for patients around the world.** Adding a Satellite Office in Massachusetts would decrease the number of patent applications awaiting examination and would connect the large Massachusetts community of patent filers and innovators with the USPTO, greatly enhancing the Massachusetts life sciences ecosystem. **A satellite office would streamline the patent system for the Massachusetts life sciences community, accelerating innovation and the development of new life-saving treatments for patients around the world.**

Thank you for your attention to this very important matter. If you have any questions or comments on the contents of this letter, please do not hesitate to be in contact.

Sincerely,

Robert K. Coughlin
President & CEO



Pete M. Nicholas
Director; Chairman of the Board; Co-Founder
Boston Scientific Corporation
One Boston Scientific Place
Natick, MA 01760-1537
(508) 650-8000

January 17, 2012

Mr. Azam Khan
Deputy Chief of Staff
United States Patent and Trademark Office
Mailstop Office of Undersecretary and Director
P.O. Box 1450
Alexandria, VA 22313-1450

Re: Docket Number PTO-C-2011-0066, Nationwide Workforce Program

Dear Mr. Khan:

Boston Scientific appreciates the opportunity to provide comments in support of a satellite office of the United States Patent and Trademark Office (PTO) in Boston, Massachusetts.

Boston Scientific is a worldwide developer, manufacturer and marketer of medical devices with approximately 25,000 employees and revenues of \$7.8 billion in 2010. For more than 30 years, Boston Scientific has advanced the practice of less-invasive medicine by providing a broad and deep portfolio of innovative products, technologies and services across a wide range of medical specialties. Boston Scientific's innovations help physicians and other medical professionals improve their patients' quality of life by providing alternatives to surgery, reducing risk, trauma, cost, procedure time and the need for aftercare.

We are a Company that believes in innovation, and whose success in developing life-saving technologies depends on a healthy and efficient patent system. This commitment to innovation is evidenced by our spending nearly \$1 billion and dedicating almost 4,000 employees every year on research and development projects. We have also acquired numerous cutting-edge technologies that will undoubtedly change patients' lives. Annually, Boston Scientific files approximately 300 patent applications in the United States and is routinely recognized in the most elite ranks among industry patent scorecards. In fact, we were recently voted one of the most innovative companies in the world by Forbes Magazine.

Much of that innovation occurs right here in Massachusetts. The Company maintains its worldwide corporate headquarters, as well as a worldwide distribution facility and headquarters for its Endoscopy and Urology/Women's Health business units, in the Greater Boston area. Within these facilities alone, Boston Scientific employs hundreds of engineers and research personnel. As a leading Massachusetts employer, our Company knows first-hand the benefits that the attractive employment environment of Massachusetts would offer the PTO. Massachusetts cities and towns populate the highest rankings for quality of life, one of many factors that contribute to Massachusetts' leadership among nationwide employee retention rates.



Letter to Mr. Azam Khan, Deputy Chief of Staff, United States Patent and Trademark Office

Page 2

January 17, 2012

Founded in Massachusetts, Boston Scientific appreciates more than most the value to be gained by strong ties to the vibrant inventor, academic and venture environment found uniquely in Massachusetts. We are joined in the region by world-class research and teaching universities, hospitals and institutions, and law schools, such as MIT, Harvard University, Boston College, Boston University, Tufts, Franklin W. Olin College of Engineering and Babson College. The area is also home to a diversity of innovative industries, such as life sciences, software, communications, energy and electrical/optical engineering. The region has received billions of dollars and ranks at or near the top among states for funding from the National Institutes of Health, the National Science Foundation, NASA, the Department of Defense and the Small Business Administration's SBIR program.

As a result, Massachusetts is also at or near the top in overall patents issued, patents per capita, percentage of venture capital investment in the country and has the highest per-capita number of patent professionals outside of the Greater Washington, DC area. This rich tradition of strong intellectual property infrastructure is a hallmark of our region and would certainly serve as a strong pool of interested, high-quality candidates for employment with the PTO in Boston.

For all of these reasons, Boston is a natural location for a satellite office of the United States Patent and Trademark Office. On behalf of Boston Scientific, we strongly urge you to consider Boston and are happy to discuss our comments further.

Sincerely,

A handwritten signature in black ink, appearing to read "Pete M. Nicholas".

Pete M. Nicholas
Director; Chairman of the Board; Co-Founder

A handwritten signature in black ink, appearing to read "Hank Kucheman".

Hank Kucheman
Chief Executive Officer

WORCESTER POLYTECHNIC INSTITUTE

OFFICE OF THE PRESIDENT

January 17, 2012

Azam Khan
Deputy Chief of Staff
United States Patent and Trademark Office
Mail Stop Office of Undersecretary and Director
P. O. Box 1450
Alexandria, VA 22313-1450

RE: Docket Number PTO-C-2011-0066
Nationwide Workforce Program

Dear Mr. Khan:

As president of the nation's third-oldest technological university, I am writing to urge the United States Patent and Trademark Office (USPTO) to establish a satellite office in Massachusetts as it moves to identify two additional new locations pursuant to Section 23 of the *America Invents Act*. I would appreciate having your assistance in bringing this plea to the attention of those responsible for making this decision.

The high concentration of research universities, technological institutes, academic medical centers, and high technology and life science industries makes Massachusetts, and especially the Boston/Cambridge area, a dense and intense hotbed of invention, innovation, and commercialization of new technologies. A satellite USPTO office in the Boston area would promote efficient protection and licensing of intellectual property both locally and throughout the New England region. There would be clear and important benefits:

to the Patent Office, by having access to the large number of technically trained graduates from Massachusetts universities as potential Patent Examiners;

to Massachusetts, by creating job opportunities for the many highly trained graduates of our institutions of higher education; and

to our universities, academic medical centers, and high technology and life science companies, by having ready access to a satellite patent office and better opportunities for face-to-face meetings with Examiners.

Massachusetts is the hub of the innovation economy on the East Coast, if not for the entire nation. It consistently ranks first or second in number of patents per capita

Azam Khan
January 17, 2011
Page 2

nationally; it has a large number of law schools offering a variety of courses and programs in patent law; and it boasts the highest per-capita number of patent professionals outside of the Arlington, VA, area.

Beyond these compelling data is our heritage of invention and innovation. As was written in 1855 in the *London Times*, after the Paris Exhibition,

“The New Englander invents normally; his brain has a bias that way. He mechanizes as an old Greek sculptured, as the Venetian painted, or the modern Italian sang.”

(In *Two Towers, The Story of Worcester Tech 1865-1965*, by Mildred McClary Tymeson, published by WPI.)

My own institution, Worcester Polytechnic Institute, is proud to have an exceptionally large number of distinguished patent law professionals among its graduates. My own daughter, with a Ph.D. degree in genetics from Columbia University, now works in the field as well. As an informed stakeholder I can therefore state with great confidence my belief that the United States Patent Office, no less than the Commonwealth of Massachusetts and all of New England, would be extremely well served by a decision to locate a satellite USPIO office in the Boston area. I strongly urge that outcome.

With appreciation for your consideration, I am

Yours sincerely,

A handwritten signature in black ink, appearing to read "Dennis D. Berkey". The signature is written in a cursive, flowing style.

Dennis D. Berkey, Ph.D.
President and CEO



January 18, 2012

Azam Khan
Deputy Chief of Staff
United States Patent and Trademark Office
Mail Stop Office of Undersecretary and Director
PO Box 1450
Alexandria, VA 22313-1450

Re: PTO-C-2011-0066; Nationwide Workforce Program

Dear Deputy Chief Khan:

On behalf of the more than 1200 members and attendees of the WPI (Worcester Polytechnic Institute) Venture Forum, we urge you to select Massachusetts as a location for a satellite office of the United States Patent and Trademark Office (USPTO). Created in 1990, the WPI Venture Forum serves innovative entrepreneurs throughout Massachusetts and New England with programs and resources relevant to technology entrepreneurship. WPI itself is a highly respected university that has a focus on engineering and science.

Massachusetts is home for many world-renowned universities, medical schools and research laboratories, including several that are recognized as the most innovative and entrepreneurial in the world. There are more than 100 colleges and universities in the Greater Boston area, and Massachusetts is also home to 11 law schools with some of the strongest intellectual property law programs in the country. Massachusetts has one of highest concentrations of world-class scientists, engineers, lawyers, patent lawyers and agents, researchers, physicians and bio-engineers, who represent a diverse and valuable source for hiring patent examiners.

Patent filing data clearly supports Massachusetts' reputation as a hub for innovation:

- More than 32,000 patents were issued to inventors in the six New England states (based on USPTO data, from 2006-2010).
- New England inventors filed more than 420,000 patent applications from 2006-2010 (second only to Silicon Valley).
- Inventors in the Boston-Cambridge-Quincy metropolitan area were granted the third highest number of patents of any metropolitan area in the U.S.
- Massachusetts consistently ranks 1st or 2nd among the states in the number of patents granted per capita (approx. 60 per 100,000 residents).
- There are approximately 3,000 registered patent attorneys and patent agents in New England.

Massachusetts is a world leader in an extraordinarily diverse range of industries: high tech, biotechnology, alternative and clean energy, medical devices, software, electrical engineering, optics, communications, nanotechnology, and pharmaceutical research. These industries disproportionately rely on the patent system. Access to these researchers and engineers will facilitate collaboration and communication with the USPTO's clients, increase examiners' expertise, improve the speed and quality of patent prosecution, and help to reduce the application backlog in the U.S.

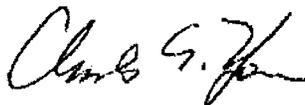
Because of its dynamic business environment and rich cultural resources, Massachusetts attracts and retains a diverse range of the brightest scientists, engineers, researchers, entrepreneurs and venture capitalists from around the world. Moreover, companies, universities, and research institutions in New England have the highest rates of retaining their employees in the U.S. Finally, Massachusetts also has one of the most extensive public transit systems in the country, including a commuter rail line extending from Worcester to Boston. Massachusetts is also home to a U.S. Department of Commerce Regional Office.

We believe that when you consider all of these factors and our vibrant innovation economy, you will agree that Massachusetts is the ideal location for the next satellite USPTO office.

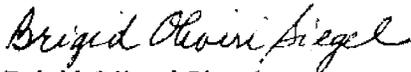
Best regards,



Deirdre E. Sanders, Esq.
Chair of WPI Venture Forum
Hamilton Brook Smith Reynolds, P.C.
530 Virginia Road
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Brian M. Dingman, Esq.
WPI Venture Forum Board Member
Mirick O'Connell, LLP
1800 West Park Drive
Westborough, MA 01580

cc: Mr. David Kappos
Congressman James McGovern
Boston Patent Law Association



Azam Khan
Deputy Chief of Staff
United States Patent and Trademark Office
Mail Stop Office of Undersecretary and Director
P. O. Box 1450
Alexandria, VA 22313-1450

RE: Docket Number PTO-C-2011-0066
Nationwide Workforce Program

Dear Mr. Kahn:

This letter is to express to you my organization's interest that you establish a satellite office of the United States Patent and Trademark Office (USPTO) in Massachusetts to serve as a central location for the New England region.

The Boynton Angels invest in small start-up companies. As you may be aware, start-up companies tend to fuel the next generation of science and technology. Start-up companies rely heavily on the patent system to establish a competitive advantage in the marketplace, and angel investors, therefore, rely on the patent system to increase the value of their investments.

Massachusetts has a great number of start-up companies, in part because of the outstanding universities in Massachusetts and New England. As you may be familiar, professors and students that work in research environments often create companies based on their research, and angel investors often support such companies.

We believe having a USPTO satellite office here in Massachusetts (or a regional office anywhere in New England) would be a preferable alternative to the Alexandria, Virginia office for the companies in which our organization, and others in our region like ours, invest.

Other examples of financial facts about New England and Massachusetts that are relevant to our interests as angel investors include the following: Massachusetts received \$268 million from the Small Business Innovation Research program in 2009, which was by far the most money per capita than any other state; Massachusetts was the leader in per capita patents granted to private companies in 2009 by the U.S. Patent and Trademark Office at 561 per million residents; Massachusetts companies in 2005 raised the 2nd highest percentage of venture capital investments in the country at 10.3% and nearly twice as high as its nearest competitor, New York, at 5.2%.

While the foregoing data is useful quantitative data, we also qualitatively suggest that Massachusetts and New England lead the nation in strength of culture of science, technology, entrepreneurship, investment, and dedication to organizational achievement.

In summary, as investors, we highly leverage our patent portfolios to meet our objective goals and believe that Massachusetts would serve the USPTO well as a venue for a satellite office in meeting its objective goals.

Thank you for your consideration.

Respectfully yours,



Lisa Kirby Gibbs
Chair, Boynton Angels LLC

Boynton Angels, LLC
1900 West Park Drive, Westboro, MA 01581
(508) 983-1452 info@boyntonangels.com



F. Kinsey Haffner
Vice President
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Robert P. Hayter
Chief Patent Counsel
Intellectual Property & Licensing
Bob.Hayter@raytheon.com

January 24, 2012
12-001-FKH

Mr. Azam Khan
Deputy Chief of Staff
United States Patent and Trademark Office
Mail Stop Office of Undersecretary and Director
P.O. Box 1450
Alexandria, VA 22313-1450

Re: Docket Number PTO-C-2011-0066
Nationwide Workforce Program

Dear Mr. Khan:

We are writing to encourage the USPTO to select Massachusetts as a site for the United States Patent and Trademark Office to locate one of its proposed satellite offices.

Raytheon Company, headquartered in Waltham, Massachusetts (Boston suburb), is a world leader in defense electronics. Raytheon has over \$25 billion in sales and 72,000 employees, over half of which are engineers. Raytheon makes world-famous products such as the Patriot and Tomahawk missiles, military radars, world-class sensors, communications equipment, air traffic control equipment and many other products to support our country and its security.

Raytheon was founded in Cambridge, Massachusetts in 1922. Its first breakthrough product was the vacuum tube in 1925 which allowed for ac powered radios. During World War II, it was Raytheon who developed a practical magnetron for powering radar. Raytheon discovered microwave cooking in 1945. Raytheon started developing missile guidance systems in the late 1940's and was awarded the contract for the predecessor to the Patriot missile system in 1967.

Raytheon's subsidiary, Raytheon BBN, helped develop the internet and employed the creators of the "@" we all use in email addresses. More recently, they created the "Boomerang" to help troops determine the location of enemy sniper fire.

We share this history to point out that innovation and intellectual property are part of our culture and heritage. The fact that over half our employees are engineers is evidence of the value we place on creativity. Innovation and technology are part of our corporate vision.

Mr. Azam Khan
Page 2
January 24, 2012

Notwithstanding that we are primarily a government contractor, we file about 400 original United States patent applications per year. Over half of our intellectual property staff is located in Massachusetts. Many of our university relationships are located in Massachusetts.

New England is a hotbed of intellectual property activity and would be well served by a satellite office. Moreover, the large technical talent pool in life sciences, software and electrical and mechanical technologies in the greater Boston area would be a good source for recruiting potential USPTO employees.

We know that the Boston Patent Law Association has extolled the virtues of the area in terms of our renown universities (technical and legal), the desirability of Boston for young people, the intensity of patenting activity and the high technology companies located in Boston and its suburbs and will not repeat the same statistics.

New England is a geographically small area and a USPTO office in Boston or its suburbs could readily serve and draw recruits from all of New England, including Rhode Island, Connecticut, New Hampshire, Maine and Vermont.

Connecticut, for example, is home to United Technologies and General Electric, two major industrial corporations that are large users of the USPTO. Connecticut also has large industrial research businesses in the pharma area, such as Pfizer. The State of Connecticut just agreed to fund Jackson Laboratory to build a \$300 million facility at the University of Connecticut Medical School in Farmington, Connecticut, to anchor a bioscience cluster extending from the University of Connecticut to Yale University in New Haven, Connecticut.

New England is known for its "Yankee" spirit and ingenuity. Many start-up companies originate here and established companies, like Raytheon, employ the talent developed here. Our universities are the best in the world. Our entrepreneurial spirit is legendary.

We request that you carefully consider Boston and its environs as an ideal location for a future satellite office.

Sincerely,



F. Kinsey Haffner
Vice President
Intellectual Property & Licensing



Robert P. Hayter
Chief Patent Counsel

FKH/RPH:lap

January 18, 2012

Mr. Azam Khan
Deputy Chief of Staff
United States Patent and Trademark Office
Mail Stop Office of Undersecretary and Director
PO Box 1450, Alexandria, VA 22313-1450

Dear Deputy Chief of Staff Khan:

Re: Section 23 of the American Invents Act

I write to encourage the USPTO to select Massachusetts for a satellite office.

From our perspective, Canadian entrepreneurs and start-ups are imbedded in Massachusetts innovation clusters and would greatly benefit from timely and high quality patent examination. Start-ups employ many graduates of Massachusetts colleges and often grow into viable small and medium sized businesses. We feel that the USPTO could not find a better location to position one of its satellite patent offices. A satellite patent office in Massachusetts would also easily service the surrounding New England states.

As you know, Massachusetts is one of the largest centers for intellectual property and has one of the largest clusters of Colleges, Universities, and Hospitals that provide higher education, advanced degrees, and post-doctoral studies in all areas of intellectual property. In addition, over a dozen world-renowned academic institutions for science and engineering are located in the Boston and Central Massachusetts areas with many more within New England. Massachusetts is a world leader in high tech, biotechnology, nanotechnology, and pharmaceutical research. I believe that these industries disproportionately rely on the patent system. In addition, New England universities and their Nobel Prize winning researcher are responsible for the most cutting-edge research in the world and greatly rely on the patent system.

According to your own USPTO data, the Boston-Cambridge-Quincy metropolitan area garnered the 3rd highest number of patents nationwide during the 2006-2010 period. When data from all six states are included, New England's over 32,000 patents and 420,000 patent applications trail only Silicon Valley. Massachusetts consistently ranks 1st or 2nd in number of patents per capita (60 patents per 100,000 people in 2008), with its closest competitor being California. Positioning a patent office in Boston, would only further encourage the already vibrant entrepreneurial ecosystem in Massachusetts, and continue to stimulate the regional and national economy.

In conclusion, I urge the USPTO to select Massachusetts as the location for the next satellite office.

Sincerely,

Patrick Binns
Consul General of Canada to New England

January 26, 2012

Via Email to satelliteoffices@uspto.gov

The Honorable David J. Kappos
Under Secretary of Commerce for Intellectual Property and
Director of the United States Patent and Trademark Office

United States Patent and Trademark Office
Mail Stop Office of Undersecretary and Director
PO Box 1450
Alexandria, VA 22313-1450

Re: PTO-C-2011-0066; Nationwide Workforce Program; **Boston Satellite Office**

Dear Under Secretary Kappos:

It is with great enthusiasm that we, as a group of professors of intellectual property law at law schools located in and around Boston, Massachusetts, join together in this letter to urge the United States Patent and Trademark Office (USPTO) to select the Boston area¹ as the site for a satellite office and to provide the USPTO with information in response to the *Request for Comments on Additional USPTO Satellite Offices for the Nationwide Workforce Program*, 76 Fed. Reg. 73601 (Nov. 29, 2011).

As professors of intellectual property law, residents and lawyers practicing in the Boston area, we are particularly knowledgeable and well-situated to provide information about Boston in support of two of the five purposes of establishing satellite offices specified in the request: (2) ‘Enhance patent examiner retention’ and (3) ‘Improve recruitment of patent examiners.’

A Boston satellite office will improve recruitment of patent examiners

The pool of patent professionals in Boston is remarkable, stable and sustainable. Massachusetts has the highest numbers of per-capita patent agents and attorneys outside of the area around the USPTO’s Arlington office.² In state, there are 1432 such patent professionals, representing 35.64 professionals per 158,000 people.³ Overall, the New England region provides a nearby prevalence of 2353 patent professionals.⁴

¹ The Boston metropolitan area is home to 4.5 million people and the tenth-largest metropolitan area in the country. "Metropolitan and micropolitan statistical area population and estimated components of change: April 1, 2000 to July 1, 2008 (CBSA-EST2008-alldata)" (CSV). United States Census Bureau, Population Division.

² Avery Index, http://www.averyindex.com/patent_states_pc.php (last visited Jan. 13, 2012)

³ Id.

⁴ Id.

Honorable David J. Kappos
January 26, 2012

This pool of patent professionals is fed by a large cluster of law schools, with ten JD-granting institutions in or near Boston⁵. Although we know of no per-capita statistical record of area law students, we can report anecdotally that year after year our classes include law students who are patent agents or working as Technology Specialists in law firms and in-house patent prosecution practices, as well as students with engineering and science degrees who plan to take the patent bar exam. The proximity of a satellite office would facilitate USPTO recruitment of students from the ten area law schools for summer or part-time internships programs, as well as participation in full-time experiential learning programs, including the co-op program at Northeastern University School of Law and externship program at Boston University School of Law.

The promise of a stable and sustainable recruiting pool for patent examiners is also evidenced by the annual stream of graduates from Boston area colleges and universities, including graduates from a dozen engineering schools and more than 100 institutions of higher education in Massachusetts. These doctoral and research universities, baccalaureate colleges, and master's degree-granting institutions⁶ provide the law, scientific and technical degrees and expertise the USPTO is seeking.

We also note that our own current positions as intellectual property professors at law schools in the Boston area demonstrate the drawing power of Boston's intellectual property, innovation and educational communities; each of us was successfully recruited to the faculty of a law school in the Boston area after attending law school, clerking for a judge, practicing law and/or residing elsewhere in the United States. That same drawing power will serve the USPTO's nationwide recruitment of examiners; a Boston satellite office will appeal to experienced patent examiners (necessary to provide mentors and training in the office), as well as providing a national magnet for both experienced patent practitioners and science/technology professionals and newly-minted patent agents, engineers and scientists.

A Boston office will improve retention of patent examiners

Boston's intellectual property, innovation and educational communities are also a factor in retention. Long known for its rich cultural heritage and educational community ('the Athens of America')⁷ -- Boston is also ranked as one of the 'most innovative cities' in the country.⁸

According to USPTO data, the Boston-Cambridge-Quincy metropolitan area is one of the metropolitan areas garnering the highest number of patents nationwide during the 2006-2010

⁵ Boston College Law School, Boston University School of Law, Harvard Law School, New England Law School, Northeastern University School of Law, Roger Williams University School of Law, Suffolk University Law School, University of Massachusetts College of Law, University of New Hampshire School of Law, and Western New England School of Law.

⁶ http://en.wikipedia.org/wiki/List_of_colleges_and_universities_in_Massachusetts (last visited Jan. 13, 2012)

⁷ See, <http://www.celebrateboston.com/culture/athens-of-america-origin.htm> (last visited Jan. 17, 2012)

⁸ Forbes Innovation: 2010, http://www.forbes.com/2010/05/24/patents-funding-jobs-technology-innovative-cities_slide_9.html (last visited Jan. 13, 2012) (ranking Boston as one of the 'most innovative cities')

Honorable David J. Kappos
January 26, 2012

period.⁹ Due to this saturation of patentees and patents, the Boston community has particular appreciation for the value of patents -- and the critical role of the USPTO *and patent examiners* - - in fostering and sustaining the advance of science and technology and supporting invention, innovation and entrepreneurial development.

The presence in Boston of so many universities with strong engineering programs and research facilities will give examiners in a Boston satellite office greater access to these *fora* and will offer more opportunities to gain understanding of other fields and to keep informed of developments in their field of science or technology.

Our law schools (Boston College Law School, Boston University School of Law, Harvard Law School, New England Law School, Northeastern University School of Law, Roger Williams University School of Law, Suffolk University Law School and University of Massachusetts College of Law) offer prestigious day and evening programs, with a wide range of courses and concentrations in intellectual property law. For example, a survey of just the IP professors signing this letter demonstrates a broad range of patent and related IP courses, including Bio-property, Copyright Law, Digital Issues in IP Law, Innovation Workshop, Intellectual Property, Intellectual Property and Access to Medicines, Intellectual Property and the Internet, Intellectual Property Thesis, International Intellectual Property Law, Intellectual Property Transactions Practice, Law, Technology and Society, Patent Law, Trademark Law, and Trade Secrets, as well as supervision of independent research projects by patent agents and other law students. The offerings of two New England law schools (Boston University Law and University of New Hampshire) consistently rank in the top ten intellectual property law programs in the country. In addition to this formal coursework, we have an active, collaborative, and open scholarly community. Several of our law schools participate in a Boston-area "*Intellectual Property Speaker Series*," in which we invite IP scholars to present works in progress to an audience of faculty, students, and the general public.

In recent years, a number of the law schools in Boston have hosted the annual "*TTAB Comes to Boston*" event in collaboration with the Boston Patent Law Association (BPLA). This event features a final hearing of the Trademark Trial and Appeal Board (TTAB), commentary on recent developments in TTAB practice and a reception where the TTAB judges have an opportunity to engage with law students, faculty and local patent practitioners. Building on this model, BPLA and Northeastern University School of Law are currently coordinating with the USPTO on the first "*BPAI Comes to Boston*."

We welcome the involvement of patent examiners and other USPTO employees at all of these events.

While the undersigned intellectual property law professors are jointly signing this letter to you, we note that we are not alone. We expect our colleagues on the faculties of all of the ten law schools located in or near to Boston will enthusiastically join us in welcoming and supporting the patent examiners and other personnel in a Boston area satellite office of the USPTO.

⁹ http://www.uspto.gov/web/offices/ac/ido/oeip/taf/cls_cbsa/allcbsa_gd.htm (last visited Jan. 18, 2012)

Honorable David J. Kappos
January 26, 2012

Respectfully submitted,

Zoe Argento
Assistant Professor
Roger Williams University School of Law

Brook K. Baker
Professor of Law
Northeastern University School of Law

Andrew Beckerman-Rodau
Professor of Law and
Co-Director, IP Law Concentration
Suffolk University Law School

Michael G. Bennett
Associate Professor of Law
Northeastern University School of Law

Ralph D. Clifford
Professor of Law
University of Massachusetts School of Law

Jonathan J. Darrow
Graduate Program Fellow
Harvard Law School

Stacey Dogan
Professor and Law Alumni Scholar
Boston University School of Law

Rashmi Dyal-Chand
Professor of Law
Northeastern University Law School

Wendy J. Gordon
William Fairfield Warren Distinguished
Professor
Boston University School of Law

Eileen M. Herlihy
Associate Professor of Law
New England Law School

Joseph P. Lui
Professor of Law
Boston College Law School

Stephen McJohn
Professor of Law
Suffolk University Law School

Michael J. Meurer
Professor of Law and
Abraham and Lillian Benton Scholar
Boston University School of Law

Susan Barbieri Montgomery
Executive Professor of Law and Business
Northeastern University School of Law and
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David S. Olson
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Boston College Law School

Maureen A. O'Rourke
Dean, Professor of Law and
Michaels Faculty Research Scholar
Boston University School of Law

Professor Benjamin N. Roin
Hieken Assistant Professor of Patent Law
Harvard Law School

Jessica Silbey
Professor of Law
Suffolk University Law School

Kara Swanson
Associate Professor of Law
Northeastern University School of Law

Alfred C. Yen
Professor of Law, Law School Fund Scholar,
and Director of the Emerging Enterprises and
Business Law Program
Boston College Law School

United States Senate

WASHINGTON, DC 20510

November 17, 2011

Mr. David Kappos
Under Secretary for Intellectual Property
Director for the United States Patent and Trademark Office
Department of Commerce
445 12th Street, S.W.
Washington, DC 20554

Dear Under Secretary Kappos:

Section 23 of the *America Invents Act* requires the United States Patent and Trademark Office (USPTO) to establish three satellite offices to carry out its responsibilities. We write to encourage USPTO to select Massachusetts as one of the locations for a satellite office.

Massachusetts, specifically Boston, is the regional hub of New England. A satellite patent office in Massachusetts will easily service the surrounding New England states. This is an effective use of taxpayer dollars when we are facing trillions of dollars in debt.

As you know, two of the goals of Section 23 are to “enhance patent examiner retention” and “improve recruitment of patent examiners.” Massachusetts is home to many world-class universities, such as the Massachusetts Institute of Technology (MIT), Harvard, Boston College, Boston University, Tufts, and the University of Massachusetts system. Therefore, USPTO could not find a better location to recruit talented patent examiners. In addition, our universities and their Nobel Prize winning researchers are responsible for the most cutting-edge research in the world and greatly rely on the patent system.

Furthermore, Massachusetts is a world leader in high tech, biotechnology, nanotechnology, and pharmaceutical research. As you know, these industries disproportionately rely on the patent system.

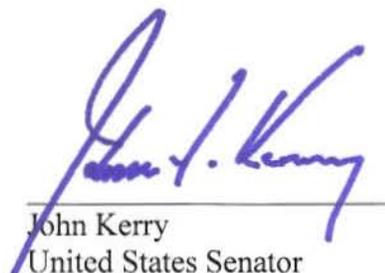
Finally, our state’s entrepreneurial spirit and innovation focused universities cause Massachusetts to be home to many start-up companies that need timely and high-quality patent examination. Start-ups employ many graduates of Massachusetts colleges and often grow into viable small and medium sized businesses.

We urge you to carefully consider Massachusetts as the location for the next satellite USPTO office.

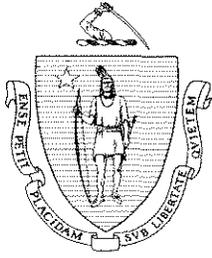
Sincerely,



Scott Brown
United States Senator



John Kerry
United States Senator



OFFICE OF THE GOVERNOR
COMMONWEALTH OF MASSACHUSETTS
STATE HOUSE • BOSTON, MA 02133
(617) 725-4000

DEVAL L. PATRICK
GOVERNOR

TIMOTHY P. MURRAY
LIEUTENANT GOVERNOR

January 13, 2012

The Honorable David Kappos
Undersecretary for Intellectual Property
Director of the United States Patent and Trademark Office
U.S. Department of Commerce
445 12th Street, SW
Washington, DC 20554

Dear Undersecretary Kappos:

I am writing to encourage you to select Massachusetts as the location for a New England regional satellite office for the United States Patent and Trademark Office (USPTO), authorized under Section 23 of the *America Invent's Act*.

Massachusetts is a global leader in research, technology, and innovation. New England has the second highest number of patents and patent applications after Silicon Valley. And Massachusetts is widely cited – from the Kauffman Foundation to the Milken Institute – as the premier location for innovation and entrepreneurship in the United States.

Our world-class colleges and universities can provide an unparalleled pool of talent for the USPTO. Our local intellectual property expertise can sustain the highest levels of professional development and community. And our cluster of inventors and entrepreneurs, from life sciences and healthcare, to defense, technology and clean energy, can both benefit from and sustain a robust dialogue with the USPTO.

As the USPTO is evaluating the locations for satellite offices, I encourage you to reach out to my office and learn more about how Massachusetts is

building the foundation for continued leadership of the U.S. innovation economy. I know that you have also heard from the leaders of Boston University, Northeastern, the University of Massachusetts, Harvard and MIT. Those world-class institutions are partnering with each other, the private sector and the Commonwealth in unprecedented ways.

I am confident that you will find our spirit of collaboration and commitment to excellence a unique and invaluable asset as you determine a location for the USPTO satellite office.

Sincerely,

A handwritten signature in black ink, appearing to read "Susan Taylor". The signature is fluid and cursive, with a large loop at the beginning and a long, sweeping tail that ends in a sharp hook.



THE GENERAL COURT OF MASSACHUSETTS
STATE HOUSE, BOSTON 02133-1053

January 20, 2012

Azam Khan
Deputy Chief of Staff
United States Patent and Trademark Office
Mail Stop Office of Undersecretary and Director
PO Box 1450
Alexandria, VA 22313-1450

Dear Deputy Chief of Staff Khan,

It has recently come to our attention that Section 23 of the *America Invents Act* of 2011 has tasked the United States Patent and Trademark Office (USPTO) with establishing three new satellite patent offices. We write to you today in regards to docket number **PTO-C-2011-0066** and to support Massachusetts as a satellite office location under the USPTO's **Nationwide Workforce Program**.

As the co-chairs of the Joint Committee on Economic Development & Emerging Technologies in the Massachusetts Legislature, we recognize that Massachusetts has a large and diverse concentration of intellectual property-related sciences and technologies, such as life sciences, pharmaceuticals, clean technology, high tech, and many others. As you know, these industries are closely tied to the patent system and would benefit greatly from a patent office located in Boston. In addition, Massachusetts already operates as an important economic hub for the region and would be an excellent location to provide services to the surrounding states.

Massachusetts is also in a strong position to support a US patent office. As one of the largest centers for intellectual property and largest clusters of colleges, universities, and hospitals, the state already has a solid foundation for a patent office. By locating in Massachusetts, we believe the USPTO would benefit greatly in recruiting and retaining patent examiners and in increasing applicant outreach.

We thank you in advance for your consideration of Massachusetts as the next location for a USPTO satellite office.

Regards,

A handwritten signature in blue ink, appearing to read "Karen E. Spilka".

State Senator Karen E. Spilka
2nd Middlesex & Norfolk

A handwritten signature in black ink, appearing to read "Joseph F. Wagner".

State Representative Joseph F. Wagner
8th Hampden District



Northeastern University



December 19, 2011

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

Dear Under Secretary Kappos:

As higher education leaders, we urge you to select Boston as a location of the next United States Patent and Trademark Office (USPTO) satellite office. With a vibrant innovation economy and a science and a technology sector that has long been a destination for the best and brightest engineers and scientists the world over, Boston is an ideal landscape in which to site a USPTO regional office.

Several world-class research universities and the cutting-edge science and technology companies they spin-off help make Boston a hub of innovation and entrepreneurship that disproportionately depends on the patent system. According to USPTO data, the Boston-Cambridge-Quincy metropolitan area garnered the third most patents nationwide during the 2006-2010 period. When data from all six states are included, New England's over 32,000 patents and 420,000 patent applications trail only Silicon Valley. This degree of activity clearly demonstrates the need for a dedicated USPTO office to service the region.

We know that Boston's education cluster is extremely well-suited to help improve recruitment of qualified patent examiners. The region's educational institutions produce a unique and diverse pool of talented engineering and science and technology graduates, particularly bio-engineers. And with more than a dozen law schools and some 3,000 registered patent professionals across New England, a Boston USPTO office would leverage existing patent education programs to strengthen connections with the local intellectual property community.

We also believe a Boston office would enhance USPTO outreach activities, improving communication with the local inventor community. Moreover, the continued growth of startup firms in the region's science, technology, defense, and healthcare sectors would help deepen examiners' expertise in emerging fields. This would lead to advances in patent prosecution times and patent quality, reducing the application backlog and easing examiner workload over time.

As we know from efforts to attract a talented workforce to our own institutions, in addition to a high standard of living and a rich civic and cultural milieu, Boston's traditional leadership in scientific discovery, innovation, and education are important quality of life measures that will have a positive effect on examiner retention. Lastly, the region's reliable transportation network, including city-centered international airport and rail links, and existing U.S. Department of

The Honorable David Kappos

Page 2

Commerce regional offices, facilitate collaboration with clients and interagency partners, and allow ready service to surrounding states.

For all these reasons, we hope you agree that Boston is ideally situated to be the next USPTO satellite office.

Sincerely,



Mel Bernstein
Senior Vice Provost for Research
and Graduate Education
Northeastern University



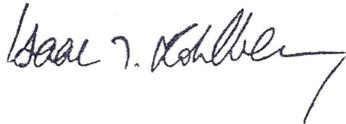
Andrei E. Ruckenstein
Vice President and Associate Provost
for Research
Boston University



Claude R. Canizares
Vice President for Research and
Associate Provost
Massachusetts Institute of Technology



Thomas J. Chmura
Vice President for Economic Development
University of Massachusetts



Isaac T. Kohlberg
Senior Associate Provost and
Chief Technology Development Officer
Harvard University

Cc:

Senator Kerry

Senator Brown

Congressman Olver

Congressman Neal

Congressman McGovern

Congressman Frank

Congresswoman Tsongas

Congressman Tierney

Congressman Markey

Congressman Capuano

Congressman Lynch

Congressman Keating

Governor Patrick



December 27, 2011

Azam Khan
Deputy Chief of Staff
United States Patent and Trademark Office
Mail Stop Office of Undersecretary and Director
P.O. Box 1450
Alexandria, VA 22314

Dear Mr. Kahn,

The Smaller Business Association of New England (SBANE) is advocating that one of the two remaining satellite patent offices pursuant to the Federal Register's solicitation under the Docket No. PTO-C-2011-0060 be located in the Greater Boston area.

There are two compelling reasons that drive our rationale for this support. Firstly, Massachusetts received \$268 million from the Small Business Innovation Research (i.e. SBIR) program in 2009, which was by far the most money per capita than any other state. Concurrently, Massachusetts is the leader in per capita patents granted to private companies in 2009 by the U.S. Patent and Trademark Offices at 561 per million residents. These metrics buttress the case that Boston is the center of the research and development universe for the East Coast, which would geographically balance your initial selection of Detroit, Michigan.

There are a number of patent law firms in the New England region, which are mostly located in the Greater Boston area. The satellite office would accelerate the time in which provisional or permanent patents get processed and reduce the backlog in the current Alexandria, Virginia central office. Obviously, the Boston/Cambridge educational axis brings with it world class institutions for higher learning and cutting edge research.

With the SBIR program and prolific patent volume in Massachusetts, we think the Boston area would be an excellent fit as a satellite location due to the fact that it would mitigate and reduce the amount of time it takes to process patent filings. I believe SBANE has offered a few compelling reasons why the U.S. Patent Office should strongly consider the Boston area as one of its remaining satellite offices. Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "Robert A. Baker". The signature is fluid and cursive, written over a white background.

Robert A. Baker
President, SBANE

Cc: Mark B. Solomon, Chair, Boston Patent Law Association



MASSACHUSETTS TECHNOLOGY DEVELOPMENT CORPORATION

December 21, 2011

Azam Khan
Deputy Chief of Staff
United States Patent and Trademark Office
Mail Stop Office of Undersecretary and Director
P.O. Box 1450
Alexandria, VA 22313-1450

**Re: Docket Number PTO-C-2011-0066
Nationwide Workforce Program**

Dear Sir:

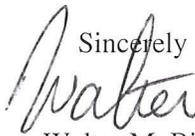
Section 23 of the *America Invents Act* requires the United States Patent and Trademark Office (USPTO) to establish three satellite offices to carry out its responsibilities. I am writing to encourage USPTO to select Massachusetts as one of the sites.

Massachusetts Technology Development Corporation (MTDC) is a 30-year-old quasi-public entity chartered to help the commercialization of nascent technologies in Massachusetts. We have made equity investments in over 130 Massachusetts companies and have a first-hand view on the power of the intellectual property developed in this region.

Massachusetts consistently ranks first or second in the number of patents per capita (60 patents per 100,000 people in 2008), with its close competitor being California. Our neighboring state, Connecticut, consistently ranks fourth (45 patents per 100,000 people in 2008).

Massachusetts has a highly diverse concentration of IP-related sciences and technologies including biological sciences, pharmaceuticals, nanotechnology, clean energy, software, medical devices, electrical engineering, optics, communications, and others. As you know, these industries rely heavily on the patent system. In addition to its top-ranked technology universities, the state also houses 11 law schools within the Boston area which provides a fertile recruiting ground for high potential patent examiners.

I encourage you to take a thorough look at all Massachusetts has to offer in determining where to locate one of the new regional U.S. patent offices.

Sincerely

Walter M. Bird
President

40 Broad Street, Suite 230, Boston, Massachusetts 02109

Voice: 617.723.4920 Fax: 617.723.5983 E-Mail: info@mtdc.com Website: www.mtdc.com



"World Class Incubators for World Class Science"

January 5, 2012

Azam Khan
Deputy Chief of Staff
United States Patent and Trademark Office
Mail Stop Office of Undersecretary and Director
PO Box 1450
Alexandria, VA 22313-1450

RE: Docket Number PTO-C-2011-0066; "Nationwide Workforce Program"

Dear Azam:

As you are aware, the United States Patent and Trademark Office (USPTO) recently requested comments regarding its announcement of at least three regional U.S. Patent Offices. Pursuant to the America Invents Act (AIA) of 2011, one of the satellite offices will be located in Detroit, Michigan, and at least two more satellite offices will be located elsewhere in the United States. The USPTO has requested comments with regard to where the remaining satellite offices should be located, which is why the Boston Patent Law Association (BPLA) is contacting you, and, of which I am full agreement of their position.

The BPLA stakeholders, of which MBI in support, write to urge the selection of Massachusetts as a satellite office venue. The USPTO is creating the satellite offices to aid in decreasing the backlog of patent applications and to create better connections with patent applicants and innovators. Therefore, our critical mass of innovators, universities, patent attorneys, numbers of patent applications filed and culture of employee commitment to employers here in Massachusetts are extremely important factors in sighting this office here.

The BPLA believes, as I do, that we will all benefit from the USPTO's ability to hire and retain not only recent graduates of the many prestigious Massachusetts and New England academic institutions, but also seasoned scientific, engineering, and legal professionals who want to change careers and serve the patent system while continuing to be members of our world class scientific, engineering, legal, educational, and entrepreneurial Massachusetts communities.

Your careful review in considering a satellite office in Massachusetts is critical to our innovation economy. Please render a positive decision and outcome as a result of our urgent request. Thank you for your hopeful acceptance of our request.

Sincerely,

A handwritten signature in black ink, appearing to read "Kevin O'Sullivan". The signature is fluid and cursive, with a prominent initial "K" and "O".

Kevin O'Sullivan
President & CEO

Camille A. Nelson
Dean and Professor of Law
tel 617.573.8155 fax 617.305.3223
cnelson@suffolk.edu



January 2, 2011

Azam Kahn, Deputy Chief of Staff
United States Patent & Trademark Office
Mail Stop Office of the Undersecretary & Director
PO Box 1450
Alexandria, VA 22313-1450

RE: PTO-C-2011-0066 and Nationwide Workforce Program

Dear Mr. Kahn:

We are writing as the co-directors of the Suffolk University Law School Intellectual Property Law Program, with the support of Dean Camille Nelson, to urge you to select Boston for a regional satellite USPTO office.

The Boston area is a superb choice for a USPTO satellite office for many reasons. Massachusetts is ranked first among all states in per capita patents granted (561 patents granted per million residents), and eastern Massachusetts is a leading center for intellectual property law and practice. A USPTO regional office in Boston would be located in a city with several leading law schools in the fields of patent law and IP. Suffolk Law School, Boston University, and Harvard each have nationally ranked intellectual property programs according to the U.S. News and World Report's 2011 survey. Suffolk University Law School is also a leading center for advanced legal studies in the field of intellectual property. Each year Suffolk organizes several all-day symposiums that review topic issues related to patent law and IP law generally.

In addition, your new satellite law office would have a rich pool of law students to select for internships, externships, and permanent employees. Suffolk's IP curriculum is extensive, featuring skills courses such as a Patent Litigation Seminar and Practice Before the U.S. Patent & Trademark Office, advanced electives such as International Intellectual Property, and traditional IP courses such as Copyright Law, Trademark Law, Trade Secrets, Internet Law, and Entertainment Law, all taught by our elite IP faculty whose internationally-recognized scholarship places them at the forefront of the legal academe. Our unique Patent Law

Specialization within our IP Concentration further allows us to offer the widest variety of patent-related courses in the region, and to train a significant number of patent attorneys.

Indeed, this course breadth and depth has contributed to our regional leadership in this area. In the summer of 2011, the Suffolk University Law School's IP program conducted a survey of patent lawyers working in the Boston area based on the Avery Index of Top Patent Firms in Boston.* Based on this study Suffolk was the top-ranked law school in training the largest number of individuals engaged in patent law practice. Suffolk graduates alone account for 149 patent law practitioners working in the Boston area. Harvard Law School was ranked second with 75 followed by Boston College with 66. Suffolk has the greatest number of patent attorneys and technical specialists with a Ph.D. — 66 in all who are practicing in Boston's top firms. This study only includes those attorneys working in the largest general service and boutique Boston law firms. A larger survey would likely demonstrate that the Boston area is a leading center for patent attorneys who attended Suffolk who practice in small and medium sized firms.

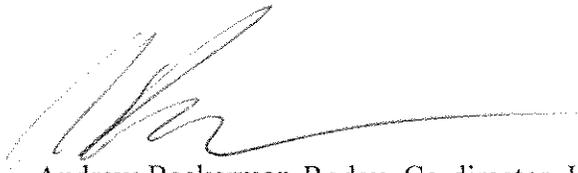
Additionally, on average at least 50 law students with hard science backgrounds attend Suffolk annually. Our evening division enables a large cohort of these students with a scientific or engineering background to be employed as patent agents or technology specialists during the day while attending Suffolk in the evening. Our evening program is highly regarded by the elite IP law firms in Boston who pay the full tuition of patent agents and technology specialists who attend Suffolk in the evening. This arrangement provides our students with a tremendous grounding in both academic and practical IP law, and gives them a distinct advantage for employment with both boutique intellectual property law firms and within the IP departments of elite law firms upon graduation. Employees in your regional office seeking law training could attend Suffolk's evening program.

Boston's location in the hub of one of the fastest growing biotechnology, software, and telecommunications centers in the country make it a natural choice for your regional office. Suffolk's recent prominence in patent law is in part due to its location in the heart of downtown Boston. In this specialized, rapidly growing area of law, high technology companies increasingly turn to Boston's patent law firms to protect their intangible intellectual property rights. Moreover, our study shows that Boston has a disproportionate number of patent lawyers who practice before the USPTO. As co-directors of one of this nation's most prominent programs in patent

* The Avery Index, (http://www.averyindex.com/patent_city_firms.php?city=Boston&st=MA), is a reliable and independent law firm ranking of patent lawyers in Boston's leading IP firms. The 10 largest Avery Index top patent law firms were: Boston's Fish and Richardson, P.C.; Wolf, Greenfield & Sacks, P.C.; Wilmer Cutler Pickering Hale and Dorr LLP; Nelson Mullins Riley & Scarborough LLP (formerly Lahive & Cockfield); Edwards Angell Palmer & Dodge LLP (now Edwards Wildman Palmer LLP); Goodwin Procter LLP; Ropes & Gray LLP; K & L Gates LLP; and Foley Hoag LLP.

law, we urge that you select Boston for your regional office. Thank you for considering our recommendation.

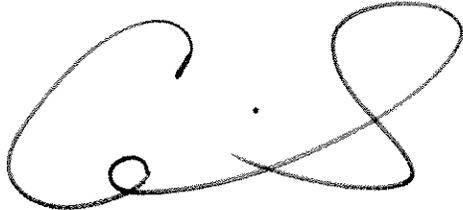
Sincerely,

A handwritten signature in black ink, appearing to read 'Andrew-Beckerman-Rodau', with a long horizontal flourish extending to the right.

Andrew-Beckerman-Rodau, Co-director, IP Law Program and Professor of Law

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

Michael L. Rustad, Co-director, IP Law Program and Professor of Law

A handwritten signature in black ink, appearing to read 'Camille Nelson', with a large, stylized 'C' and 'N'.

Camille Nelson, Dean and Professor of Law

CC: Senator Scott Brown

CC: Senator John Kerry



AVERY W. CATLIN
SENIOR VICE PRESIDENT
CHIEF FINANCIAL OFFICER

ccatlin@celldextherapeutics.com
Direct dial: 781-433-3148

January 10, 2012

Mr. Azam Khan
Deputy Chief of Staff
United States Patent and Trademark Office
Mail Stop Office of Undersecretary and Director
PO Box 1450
Alexandria, VA 22313-1450

Ref: PTO-C-2011-0066; Nationwide Workforce Program

Dear Deputy Chief of Staff Khan:

Section 23 of the *America Invents Act* (AIA) of 2011 requires the Patent and Trademark Office (USPTO) to establish three satellite offices to carry out its responsibilities. As the Chief Financial Officer of a NASDAQ-listed, Massachusetts-headquartered, leading targeted immunotherapy company, I am writing to encourage USPTO to select Massachusetts as one of the locations for a regional satellite office.

Celldex Therapeutics, Inc. (Celldex) owns or licenses rights under more than 400 granted patents and national and regional patent applications around the world covering inventions relating to our business. Celldex relies heavily on its patent portfolio to protect its research and development programs and intellectual property assets. A locally-based USPTO office would provide more timely and high-quality patent examinations for Celldex's expanding patent portfolio.

Massachusetts is a world leader in life science and biotechnology research and a regional satellite office in Massachusetts would certainly benefit this important, dynamic growth industry. Massachusetts is also the home to world-class universities, colleges and medical research centers from which USPTO could recruit talented patent examiners.

I strongly urge USPTO to consider Massachusetts as the location for its next satellite office.

Sincerely,

A handwritten signature in blue ink, appearing to read "Avery W. Catlin", is written over a light blue circular stamp.

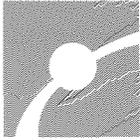
Avery W. Catlin
Senior Vice President and
Chief Financial Officer

www.celldextherapeutics.com

119 Fourth Avenue
Needham, MA 02494
Tel: 781-433-0771
Fax: 781-433-0262

151 Martine Street
Fall River, MA 02723
Tel: 508-742-4300
Fax: 508-742-4309

222 Cameron Drive, Ste. 400
Phillipsburg, NJ 08865
Tel: 908-454-7120
Fax: 908-454-1911



Museum of Science®

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617-589-0187 (fax)
mos.org

January 11, 2012

Mr. Azam Khan
Deputy Chief of Staff
United States Patent and Trademark Office
Mail Stop Office of Undersecretary and Director
PO Box 1450
Alexandria, VA 22313-1450

RE: PTO-C-2011-0066; Nationwide Workforce Program

Dear Mr. Khan:

The Museum of Science (“the Museum”), located in Boston and Cambridge, Massachusetts, recommends that the United States Patent and Trademark Office (USPTO) establish a satellite office in the Cambridge-Boston area.

The Museum of Science is a hub of research and invention that is New England's most visited cultural institution. The Museum has always moved visitors to think like scientists through hands-on, minds-on experiences. Today, with 1.5 million visitors a year, we are redefining the way people think about, learn about, and interact with science and technology.

The Museum has long been a regional and national leader among science museums. Now, the Museum is poised to play a significant role in building technological literacy and an understanding of the human-made world. For example, the Museum's National Center for Technological Literacy harnesses the Museum's spirit of fun education to inspire children, educators, and the public to learn how things work.

The Museum serves as the venue for a program for patents, known as the *Invented Here!* program. The *Invented Here!* program allows the public to nominate New England inventors and their recently issued patents for consideration by the Museum. From among the many inventor/invention nominees, the Museum selects top honorees to showcase their inventions to visitors in a fun, interactive manner. The *Invented Here!* program demonstrates to visitors how patented technology can have positive impacts on the human experience.

The Museum is an example of the culture of science and engineering education that is prominent in New England and supports the Museum in its staffing. Moreover, as a former university dean and professor, I can attest to the science and engineering talent that can be found in Massachusetts and would be available for the USPTO to attract enthusiastic and committed patent examiners.

In conclusion, the Museum would welcome a regional office of the USPTO into the local science and engineering community, as would our extensive network of educational and business supporters.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Ioannis N. Miaoulis".

Ioannis N. Miaoulis
Museum Director and President

MASSACHUSETTS LIFE SCIENCES CENTER

January 17, 2012

Mr. Azam Khan
Deputy Chief of Staff
United States Patent and Trademark Office
Mail Stop Office of Under Secretary and Director
P.O. Box 1450
Alexandria, VA 22313-1450

RE: *PTO-C-2011-0066; Nationwide Workforce Program*

Dear Mr. Khan:

The Massachusetts Life Sciences Center (“the Center”) respectfully submits this letter to encourage the United States Patent and Trademark Office (“USPTO”) to establish a New England regional satellite office in Massachusetts as authorized through Section 23 of the *America Invents Act of 2011* (“AIA”).

By way of background, the Center is a quasi-public agency of the Commonwealth of Massachusetts tasked with implementing the Massachusetts Life Sciences Act, a ten-year, \$1 billion initiative that was signed into law in June of 2008 by Governor Deval Patrick. The Center’s mission is to create jobs in the life sciences and support vital scientific research that will improve the human condition. This work includes making financial investments in public and private institutions that are advancing life sciences research, development and commercialization as well as building ties between sectors of the Massachusetts life sciences community.

In the course of executing our mission, the Center has launched several key programs - through the awarding of a mixture of grants, loans and capital investment dollars - that are designed to create jobs and support scientific research to improve the human condition. We award funding under these programs to eligible entities based on criteria. The criteria comprise a number of factors, including ability to develop new technologies and to protect those technologies with patents, which expand the diversity and variety of life sciences within Massachusetts.

Compared to other regions of the United States, Massachusetts (especially the Boston-Cambridge-Quincy metropolitan area) has a uniquely high concentration of IP related sciences and technologies including biological sciences, pharmaceuticals and medical devices to name just a few. Massachusetts is consistently ranked 1st or 2nd in number of patents per capita (60 patents per 100,000 people in 2008), with its closest competitor being California.

The Center believes that not only will Massachusetts and New England companies benefit from a satellite USPTO office, but that the USPTO will benefit as well by allowing the region to serve as a catalyst for the USPTO to reach the goals and objectives of this new program. Massachusetts has a wealth of occupational clusters including life sciences, IT, nanotechnology, clean energy and engineering. Additionally, the number of patent applications that are filed here outpaces much of the rest of the country and the presence of and focus on higher education in science and technology is renowned.

The Center itself has a committed staff of employees dedicated to growing the life sciences here in Massachusetts. We believe that the staff exemplifies the type of individuals committed to the Massachusetts entities currently supporting the diverse fields of life sciences and their workforces.

Again, the Center respectfully encourages your serious consideration of Massachusetts as an ideal regionally-central location for one of your satellite offices.

Sincerely,

A handwritten signature in cursive script that reads "Susan Windham-Bannister". The signature is written in dark ink and is positioned above the printed name.

Susan Windham-Bannister, Ph.D.
President and CEO