



Pete M. Nicholas
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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.



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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