



January 30, 2012

**VIA EMAIL to [satelliteoffices@uspto.gov](mailto:satelliteoffices@uspto.gov)**

The Honorable John Bryson, Secretary  
United States Department of Commerce  
1401 Constitution Ave., NW  
Washington, D.C. 20230

Re: Establishment of USPTO Satellite Office in the Portland, Oregon region

Dear Secretary Bryson:

I write to you in support of establishing a United States Patent and Trademark Office (USPTO) satellite office in the Portland, Oregon region. Portland is the perfect location for a West Coast satellite office due to its (1) high rate of innovation per capita, (2) low cost of doing business, (3) high livability, and (4) high concentration of USPTO registered practitioners.

1. Oregon's high rate of innovation and reduction of USPTO backlog

Oregonians are innovative people. Among states, Oregon ranks 7<sup>th</sup> on patent grants per capita (see table below) based on 2011 USPTO statistics for patents granted to inventors residing in each state, and 2010 U.S. Census data. In absolute numbers, Oregon ranks 16<sup>th</sup> among states for 2011 patent grants. A USPTO satellite office in the Portland region would support these inventors, by enabling face-to-face communication during the examination of these applications. Such direct communication also promises to shorten overall examination time and reduce USPTO backlog, by simplifying issues and speeding prosecution of patent applications from Oregon. Many Oregon intellectual property law firms, including ours, draw a significant portion of their work from outside the state. These prosecution efficiencies will also apply to patent applications of our out-of-state clients, magnifying the backlog reducing effect.

2. Low cost of doing business in Oregon will improve USPTO budget

Oregon has a low cost of doing business as compared to other cities on the West Coast, such as San Diego, Los Angeles, San Francisco, and Seattle. In these tough economic times, the USPTO would be wise to save money on items such as rent, utilities, and construction costs, in an ongoing effort to strengthen the nation's fiscal situation.

3. Oregon's high livability will improve Examiner retention and recruitment

Oregon also features affordable housing, livable cities, extensive natural beauty and recreational opportunities, an excellent K-12 school system, world class universities, and varied employment opportunities for the spouses of examiners who choose to relocate here. In Portland, population densities support vibrant neighborhoods and extensive public transit infrastructure, making commuting relatively painless. Indeed, Portland has high bicycle commuting rates as compared to other metropolitan regions nationwide. Patent examiner's salaries would go farther in this region,

and their quality of life would benefit from the numerous recreational opportunities that Oregon has to offer. We submit that examiners who are given the opportunity would jump at the chance to relocate here. Further, the region boasts an educated workforce suffering from a relatively high unemployment rate. Therefore the USPTO should expect its local recruiting efforts in Oregon to yield highly qualified, highly motivated individuals.

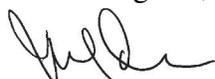
#### 4. Registered USPTO practitioners in Oregon and the effect on reducing USPTO backlog

Our firm will file many hundred patent applications and respond to close to a thousand office actions from the USPTO in 2012. And, we are merely one of numerous intellectual property law firms in the Portland region. Location of a satellite in Portland would facilitate face-to-face interviews between the region's patent attorneys and USPTO examiners, and would also eliminate the 3 hour time lag between USPTO business hours and West Coast business hours. As a result of such direct communication, prosecution issues may be more quickly resolved, and the USPTO backlog of patents awaiting examination will be reduced.

In conclusion, the establishment of a USPTO satellite office in Oregon would clearly benefit our region by providing quick access to USPTO resources for inventors, the companies that employ them, and their patent counsel. The region would also benefit as high tech industries become more attracted to our region due to the USPTO presence. We also submit it would be a boon to examiner recruiting and retention, and a tremendous help in reducing USPTO backlog.

We look forward to your support in locating a satellite office in our region.

Warmest regards,



Mark Alleman, partner  
Alleman Hall McCoy Russell & Tuttle LLP

**TABLE 1 - TOP 10 STATES FOR 2011 PATENT GRANTS PER CAPITA**

Rank	State	Total 2011 utility, design, plant, and reissue patents (USPTO data)	Population (2010 U.S. Census data)	2011 Patent grants per 2010 capita
1	VERMONT	536	625,741	0.000857
2	MASSACHUSETTS	5526	6,587,536	0.000839
3	CALIFORNIA	30748	37,253,956	0.000825
4	MINNESOTA	4227	5,303,925	0.000797
5	WASHINGTON	5266	6,724,540	0.000783
6	IDAHO	1089	1,567,582	0.000695
<b>7</b>	<b>OREGON</b>	<b>2371</b>	<b>3,831,074</b>	<b>0.000619</b>
8	NEW HAMPSHIRE	805	1,316,470	0.000611
9	CONNECTICUT	2121	3,574,097	0.000593
10	DELAWARE	457	897,934	0.000509