Dear Ms. Till,

Please see the attached letter. Let me know if you have any difficulty opening the document.

Sincerely,

Mary Sue Coleman
President
University of Michigan
Ms. Mary C. Till  
Senior Legal Advisor  
Office of Patent Legal Administration  
Office of the Deputy Commissioner for Patent Examination Policy  
Mail Stop Comments – Patents  
Commissioner for Patents  
Post Office Box 1450  
Alexandria, Virginia  22313-1450

Via email:  fitf_guidance@uspto.gov

Re: Docket No. PTO-P-2012-0024

November 2, 2012

As a major research university that has helped develop thousands of patents, the University of Michigan strongly endorses the comments filed by the Association of American Universities and five other higher education associations with the U.S. Patent and Trademark Office on October 5, 2012. This endorsement reflects the views of our Technology Transfer Office, those individuals on the ground who help navigate the patent process for our campus.

In particular, we are in full agreement that the proposed examination guidelines related to treatment of the grace period raises serious concerns. These guidelines fly in the face of clear legislative intent as spelled out by both chairmen of the House and Senate Judiciary Committees. Such an interpretation of the America Invents Act could have serious and unnecessary negative consequences to innovation on American university campuses, at a time when we need that innovation more than ever.

We urge that the Patent and Trademark Office adopt language that interprets the new patent law in a manner that effectively implements the clear intention of Congress.

Sincerely,

Mary Sue Coleman  
President