

Dear Mr. Clarke:

While I favor the electronic maintenance of records, I believe that the system could be improved further by requiring or permitting the filing of applications in Adobe .pdf format. More specifically, a text file should be "distilled" into .pdf format, thereby preserving the text as text. Such text is searchable, the text in an image file is not searchable.

There is an ambiguity in saying ".pdf" format because an image file can be rendered as a .pdf file. To be truly useful, the .pdf file must be derived from a text file, not from scanning.

As a former (long ago) examiner, I can say confidently that being able to search text electronically would be a tremendous advantage. For example, one can immediately find the description of an element in a drawing merely by searching for the reference number. Similarly, one can immediately determine whether or not there is antecedent in the description for a claimed word or phrase by simply searching for the word or phrase.

I suggest considering a requirement for a text searchable .pdf file format for patent specifications. I often send the specification and drawings of applications to clients in this format and have found it very useful.

A downside is that vendors forever try to resell the same horse as an incremental "upgrade" and eventually obsolete an older version of software by changing the format in which a file is stored. Requiring, i.e. freezing, the version would obviate this problem; e.g. require compatibility with Acrobat 4.0.

Having personally cleaned up image copies of old patents, I wonder how the PTO intends to prevent alteration of the image files. That is, data security does not seem to be addressed.

Is there any concern with identity theft? Providing the public with images of signatures from formal papers and other documents would seem a boon for a thief. Signatures can be readily copied and transferred to other documents with perhaps unfortunate consequences. On the other hand, if a signature is obliterated in an official record, how can one authenticate the record? How can I sign a document if I do not want my signature reproduced around the world?

Very truly yours,

Paul F. Wille
Reg. No. 25,274

