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From: Chyau Liang

Sent: Thursday, July 20, 2006 3:32 PM

To: Rfa-patents.comments

Subject: comments on size standard for PTO

71 Fed. Reg. 38388

Dear Sirs:

This comment concerns the definition of "small entity" for paying reduced fees at PTO.

I think the current practice is fair – a small entity has less than 500 employees **and** has not licensed the technology to a large entity.

In reality, when a small business licenses its technology to a large entity, the large entity will typically pick up the costs for patent prosecution. So, the current practice does not unfairly burden the small entity.

On the other hand, if the small entity exclusion is abolished, large entities can take advantage of the reduced fees by utilizing small entities to prosecute their patents and retain control of the patents by licenses.

Regards,

T. Chyau Liang

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