June 29, 2001

Robert A. Clarke   Via Electronic Mail
Box Comments--Patents
Commissioner of Patents
Washington, DC 20231

   Re: Response to Notification of Required and Optional Search Criteria for
   Computer Implemented Business Method Patent Applications in Class 705, and
   Request for Comments.[1]

Dear Mr. Clarke,

Thank you for the opportunity to provide written comments to the subject notice on
behalf of Environmental Systems Research Institute, Inc. (ESRI). ESRI is an industry
leader in the design and development of Geographic Information Systems (GIS) software.
Among other things, GIS software allows users to locate, compare, and display attributes
and their interrelationships on a computer generated map.

My comments address our recommendation of our Geographical Information System
(GIS) Bibliography database as either a supplemental resource for business method
applications utilizing GIS or a Subject Specific Database, if GIS and related applications
such as location based services were added as a subclass to Class 705. The Patent and
Trademark Office may already have begun using this database since we had previously
suggested such use in a letter dated May 18, 2000, to Ms. Kris Vajs of your Scientific &
Technology Information Center (STIC). Besides briefly discussing our database, that
letter also accompanied other supplementary resources in the form of printed documents
and an associated Excel index. The letter also advised Ms. Vajs that we were adding her
name to our subscription list for ArcNews and ArcUser, two regular ESRI publications. I
have attached a copy of the letter for your convenience.

Our GIS Bibliography database is publicly accessible through ESRI's Virtual Campus
Library Web site, at http://campus.esri.com/campus/library, and contains bibliographic
records for literature related to GIS. The literature spans the life of GIS, from 1961 to the
present. Much of this information is not currently available through other bibliographic
sources like Dialog and ScienceServer, especially considering the keywording and
abstracting that the GIS Bibliography database provides. Moreover, some bibliographic
records link to full-text papers. Thus, ESRI's GIS Bibliography database consists of
materials that are impossible or difficult to find through other methods.

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[1] 66 Fed. Reg. 30167 (2001).

At this time, our GIS Bibliographic database contains more than 10,000 records. More references are added every day through continuations of series that are already contained in the bibliography, adding foreign and historical materials, and adding materials from sources outside mainstream GIS literature. Collection efforts focus on conference proceedings, journal articles, and books. The collection also includes significant magazine and newspaper articles, reports, and selected theses.

The aim of the GIS Bibliography is to collect references to all significant literature on GIS, regardless of source. Although ESRI maintains and expands the bibliography, and ESRI materials are included, the bibliography is by no means an ESRI "source." In other words, collection efforts focus on the field as a whole. At the moment, the bibliography predominantly consists of North American sources, but efforts are underway to include more literature from around the world. We will also continue retrospective coverage of GIS's technical history.

The intuitive interface, which has undergone extensive user testing and modification, provides single-search access to the entire contents of the bibliography and the capability to search by multiple access points using Boolean searching. Access is free of charge. Users may search the entire bibliography and look at individual bibliographic records without signing in. If a user creates a user account and signs in, they may select references to be emailed to them or to an address they specify. Information about a user's search (what they search for or the search results) is not retained.

More specific responses are provided to the following subsections of Part II, Section A, of the Notification, entitled, "Resource Recommendations":

Database identification

a.) Name of Database: ESRI Virtual Campus Library, a.k.a. GIS Bibliography

b. & c.) Contact Information:
ESRI
Attn: Library
380 New York Street
Redlands, CA 92373
  Telephone: (909) 793-2853 x1275
  Fax: (909) 793-5953
  Email: campus@esri.com

Database content

a.) Years of coverage: 1961-present
b.) Subject matter: Geographic information systems (includes the subjects: location based services, routing, facilities management, law enforcement, spatial analysis, computer mapping, desktop mapping, automated cartography, geomatics, geospatial data, and digital spatial data).
c.) Documented publication dates: Yes.

d.) Abstracts: Yes for all records. Full text: for some records (where we have copyright permission to reproduce).

Accessibility

  a.) Accessible to public: Yes.
  b.) Hours of operation: The Database is available 24 hours a day.

Technical Support

Problems or questions can be addressed by telephone or email. Our business hours are 8:30 a.m. to 5:30 p.m. Pacific Time, Monday through Friday.

Continuity

Backfile data: Our objective is to provide a complete historical resource for literature concerning the GIS field. We will continue to add materials from earlier years. Bibliographic references/full-text materials are not deleted from the database.

Mode of access

Web based. (http://campus.esri.com/campus/library)

Again, we appreciate the opportunity to provide written comments for improving the effectiveness and efficiency of the PTO's review of nonpatent literature. This issue is of great importance to our company and, we believe, to the continued vitality and growth of the GIS niche of the business world.

Sincerely,

/s/

Bruce Lathrop
Business Attorney
Registration No. 41,929

BL

May 18, 2000

Ms. Kris Vajs
Scientific & Technology Information Center (STIC)
U.S. Patent and Trademark Office
Room 2C08 CP 3-4
2021 S Clark Place
Arlington, VA 22202

Re: Donation of Material for PTO Prior Art Collection in the Area of Geographic
        Information Systems (GIS) Software and Applications

Dear Ms. Vajs:

        Pursuant to the procedure suggested by Fredrick Schmidt, Administrator for
Search and Information Services, PTO, I am enclosing with this letter six boxes of
material that Environmental Systems Research Institute, Inc., (ESRI) considers useful
prior art for inclusion in your prior art collection in the area of geographic information
systems (GIS) software and applications. I have also attached a copy of an Excel
spreadsheet that itemizes the material in the boxes. Finally, I have included a diskette
with a copy of the spreadsheet file. If we can be of further assistance by converting the
file to a different format, please let me know.

        In light of the Internet explosion, examiners might find particularly useful several
references from 1994 and earlier that discuss connecting our GIS software to the
"information superhighway" and other networked uses. At the time, ESRI envisioned
such distributive GIS to be a logical application of our software capabilities. I have
marked with Post-its at least some of these references. Those references are in the pocket
folder in Box # 3.

        We are also adding your name and office to our subscription list for regular ESRI
publications, including *ArcNews* and *ArcUser*. These periodicals are published regularly
to our software users and describe new software developments and the ways our users
have applied our software to meet their organization's GIS requirements. You will
initially receive these in hardcopy format. However, after you have reviewed a few
issues, please advise whether it would be more helpful to receive these in a particular
digital format. We can then provide them to you in both hard and soft copy format or, if
you prefer, only in soft copy format.

        Finally, examiners may find very helpful our on-line virtual campus, and
especially the searchable reference database located at that site. Examiners can access

the database by going to http://campus.esri.com/, clicking on "USA," then "Library," then "GIS Bibliography." From there, examiners can enter search terms such as "information superhighway" or "Internet" to obtain articles concerning GIS and those topics, or other topics.

As the leader in GIS software for over twenty years, we are confident that PTO examiners will find the foregoing material helpful in understanding the area of GIS software and applications.[2] Besides the information provided with this letter and our future publications, we anticipate reviewing additional past records and will provide them to you as soon as they are organized.

Please let me know if you have any questions or comments, and the format of any digital information you would like to receive.

Sincerely,

 /s/

Bruce Lathrop
Business Attorney
Reg. No. 41,929

BL:ea

Enclosures: As stated above

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[2] Box 3 contains a number of third-party references, which may be our only copies. Specifically, these references are the bound publications from the American Society of Photogrammetry and Remote Sensing (ASPRS-ACSM) and the Urban & Regional Information Systems Association (URISA). If upon your initial review, you do not wish to keep these volumes, please let me know and we can give you a FedEx number for their return. Otherwise, you are welcome to keep, return, or dispose of them in a manner consistent with the handling of other PTO prior art references provided by third-parties.