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Sent: Wednesday, May 03, 2006 3:33 PM

To: AB94Comments

Subject: AB94Comments

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**THE PHILADELPHIA INTELLECTUAL PROPERTY
LAW ASSOCIATION
PHILADELPHIA, PA**

May 3, 2006

Via Email to AB94Comments@uspto.gov

The Honorable Jon Dudas
Under Secretary of Commerce for Intellectual Property
And Director of the United States Patent and Trademark Office
Mail Stop Comments - Patents
P.O. Box 1450
Alexandria, VA 22313-1450

RE: Comments on Proposed Rules: "Changes to Practice for the
Examination of Claims in Patent Applications"
71 Fed. Reg. 61 (January 3, 2006) RIN 0651-AB94

Dear Under Secretary Dudas:

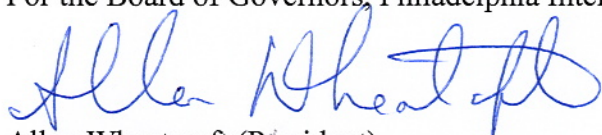
The Board of Governors of the Philadelphia Intellectual Property Law Association ("PIPLA") is providing the following comments to the currently *proposed* United States Patent and Trademark Office ("PTO") set of rules, "*Changes to Practice for the Examination of Claims in Patent Applications*" 71 Fed. Reg. 61 (January 3, 2006)(herein: "*The Proposed Claims Practice Rule Changes*").

PIPLA acknowledges the PTO's laudable effort to adopt rules intended to improve efficiency and patent quality in accordance with the USPTO 21st Century Strategic Plan. However, PIPLA has serious concerns with *The Proposed Claims Practice Rule Changes*. The PTO proposal on the examination of claims and a companion proposal on continuations put forward significant changes to the existing rules for the examination of patent applications that we foresee would lead to undesirable results. Accordingly, PIPLA respectfully recommends against the adoption of *The Proposed Claims Practice Rule Changes*.

As to specific comments, PIPLA endorses the reasoning and positions expressed in two sets of Comments that were submitted by others last week. The first is the 14-page submission of the American Intellectual Property Law Association on April 24, 2006. The second is the 6-page submission of the Office of Advocacy of the U.S. Small Business Administration on April 27, 2006. Having reviewed these two submissions, we concur in their recommendations and hereby endorse them.

Respectfully submitted,

For the Board of Governors, Philadelphia Intellectual Property Law Association

A handwritten signature in blue ink, appearing to read "Allan Wheatcraft". The signature is fluid and cursive, with a large initial "A" and a long horizontal stroke extending across the middle of the name.

Allan Wheatcraft (President)

Philadelphia Intellectual Property Law Association