

Robert W. Bahr, Esq.
Senior Attorney
Office of the Deputy
Commissioner for
Patent Examination
Mail Stop, Comments
Commissioner for Patents
Alexandria, VA 22313-1450

Re- Comments to Continuing Applications

Dear Mr. Bahr,

My name is Glenn Gerald Strawder. I am an individual inventor, a small entity. I have been allowed over a dozen U.S. Patents. I strongly disagree with your proposed rule relating to continuing applications for it will hurt me, all individual inventors and small corporations.

In my opinion, the reason you are having so many RCE cases is that the Examiners have not been thorough and have not cited the best prior art early in the case. For example, it was not unusual in most of my prior cases for us to consider a second RCE simply because the Examiner has acted on the case several times and after a first RCE we received two new actions both of which rejected claims on new prior art.

Your proposed test of requiring a showing by the applicant that the amendment could not have been previously submitted is far too strict. Literally it would be almost impossible to make such a showing.

Page 1 of 3

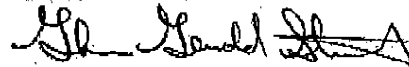
For example, assume that the attorney must file a second RCE due to the Examiner's lack of attention to the case. It would certainly be embarrassing for the attorney to say that.

Furthermore, it is not always improper for an inventor to delay his case a reasonable amount so he can make sure his claims cover someone who has copied the inventor's invention. Indeed, the PTO often declares an interference during which the inventor can find out what another party is doing and allows him to cover it with new claims.

The PTO's methods and quota system is responsible for more RCE's than anything else. An Examiner is expected to fully study a new application, search the art, and render an action in just a few hours. To avoid inadvertently issuing a patent under the above circumstances many, if not most, Examiners do not allow claims on the first action. Often, true prosecution does not begin until the second office action or after a final rejection. It is no wonder that so many RCE's are filed.

Therefore, no showing should be required for a reasonable number of RCE's, but if you must require a showing it should be no more than a requirement that the attorney certify that he or she feels it is necessary for the inventor to be adequately protected.

Sincerely,



Glenn Gerald Strawder

Page 2 of 3

Mail Address: Glen G. Strawder
14111 Armilla Court
Burtonsville, MD 20866

Fax: 301-847-0161

Page 3 of 3

PAGE 2/3 * RCVD AT 5/3/2006 10:40:30 AM [Eastern Daylight Time] * SVR:USPTO-EFXRF-1/6 * DNIS:2737735 * CSID:* DURATION (mm-ss):01-12

PAGE 3/3 * RCVD AT 10/10/2006 3:29:51 PM [Eastern Daylight Time] * SVR:USPTO-EFXRF-5/12 * DNIS:2737719 * CSID:12345678901234567890 * DURATION (mm-ss):00-54