

October 28, 2001

6389 Lakeview Drive
Falls Church, VA 22041

Ronald Hack
Acting Chief Information Officer
The Under Secretary of Commerce for
Intellectual Property and Director of the
United States Patent and Trademark Office,
Washington D.C. 20231

Dear Mr. Hack:

I am writing in response to your request for comments on the issue relating to your plans to remove the patent paper files from the public search room of the USPTO. The elimination of the paper files is a goal that is not in the best interest of the public. The paper files of the public search room are a valuable and unique national resource that should not be removed. Their removal will be an increased barrier to our nations technology and innovative progress and productivity.

Currently the Public Search Room is the only single location with paper patents classified and cross referenced by subject. This provides a valuable resource for inventors, researchers and attorneys that are not matched by any existing physical collection or database in the world. The paper files allows for productive and efficient researching relating to the novelty of inventions that is not closely matched by the electronic document systems.

The current electronic document systems are useful for increasing the productivity for some types of evaluations, such as determining best classifications for subsequent use in a paper search. When used exclusively, the electronic systems have many shortfalls. It is often necessary to look at the particular shape, element, construction or circuit that is key to the innovation of an invention. Thumbing through the paper files provides an efficient and productive source for research; a keyword search using the electronic system yields very unproductive results. Mouse clicking through the electronic documents is cumbersome and more time consuming.

Additionally, as a frequent user of the public search facility, it is typical to spend days or weeks intensively reading patent documents. The current technology of the computer monitors do not match the optical contrast that is displayed from paper documents. Just as electronic books have not yet become practical, CRT and LCD screens do not allow for safe prolonged reading of documents and result in known health problems such as eyestrain.

The library of paper documents provides a secure hardcopy for the collection. Electronic documents are often lost, dependant on power and quickly become obsolete with frequent changes in formats. The long-term security of the documents is best preserved by maintaining a paper file backup.

The electronic system provides certain benefits and best is used in conjunction with the paper files but are not a sufficient replacement for them. The Paper files of the Patent Office are a unique and valuable national resource. Ease of research provided by use of the paper files has allowed for the transfer of knowledge contributing to our nations technological advances and innovations. The paper files should remain intact as a valuable asset to benefit future research and progress.

Sincerely,

David Goldstein