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September 24, 2001

VIA FACSIMILE

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

Re: Notice of Request for Comments
Federal Register, August 27, 2001

Dear Mr. Hack,

In response to the Notice on removal and elimination of the paper files, it is my earnest desire to see that Department of Commerce continue to maintain the paper files and keep them available for public access.

Currently, the EAST system database provides for a valuable supplement to a manual search but does not provide the equivalent. This search tool can be useful for targeting specific key terms within generalized or specific classification areas, however, there is no standardization of key words. The most objectionable drawback is user fatigue which can occur within one hour or less when staring at a monitor. Reading lengthy or highly technical portions of text from a computer monitor is extremely tedious and difficult. Attempting to read for six to eight hours is futile. Simply put, electronic files do not provide an equivalent substitute for reading and physically paging through paper patent files.

Ronald Hack
Acting Chief Information Officer,
September 24, 2001
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I have conducted patent searches both independently and for various law firms over the past 16 years. Based on my experience, the ability of private individuals and law firms to conduct patentability, novelty, infringement, right to use and validity searches will be greatly degraded. Invariably, the difficulty and cost of search work will increase and the quality will be significantly compromised. The paper files must be maintained and kept available for public access.

Very truly yours,

JONES, TULLAR & COOPER, P.C.

Gerald C. O'Brien

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GCO:pp

