

From: NeilThomas[e-mail address redacted]

Sent: Monday, October 31, 2011 12:30 PM

To: ai_a_implementation

Subject: Inter partes review - Post grant review -Transitional program for covered business methods

Small- and micro-entities will be subject to numerous, extremely costly, multiple challenges including: ex parte reexamination, inter parte review PGR, and in applicable cases, Sec. 18 Transitional program for covered business methods proceedings.

Most small and micro entity patentees will not be able to withstand all these costly challenges and their patents will in many cases be rendered essentially worthless .

What provisions and protections will the PTO institute to protect small and micro entity patentees, including:

Will the PTO provide pro bono legal assistance as of right to protect small and micro entity patentees?

Will the PTO consolidate proceedings?

Will the PTO expedite proceedings for small entities?

Will the PTO provide full-time support including legal staff for small and micro entities, to advocate for small entities including reviewing references, etc.?

Will the PTO limit the number of references to only the most relevant?

Will the PTO impose sanctions and assess costs against unsuccessful petitioners?

Thank you,

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