From: Joel Pedersen

Sent: Friday, October 05, 2012 7:09 PM

To: fitf_guidance

Subject: Comments on proposed rules

ATTENTION - Mary C. Till, Senior Legal Advisor

Re: Comments on Proposed Rules for: Examination Guidelines for Implementing the First-Inventor-File Provisions of the Leahy-Smith America Invents Act 77 Fed. Reg. 43759 et seq. (July 26, 2012)

I write to urge the USPTO to adopt a "broad" construction of the First-To-Publish Grace Period Exceptions in AIA Section 102(b) subparagraphs (B), instead of the currently proposed "narrow" construction of the scope of these FTP Grace Period Exceptions relative to the intervening disclosures of others.

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