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To: SatelliteOffices Cc: Horton, Carl (GE Corporate)

Subject: Response to Request for Comments -- Section 23 of America Invents Act

January 30, 2012

The Honorable David Kappos Under Secretary of Commerce for Intellectual Property and Director of the United States Patent and Trademark Office US Department of Commerce Madison Buildings (East & West) 600 Dulany Street Alexandria, VA 22314

Response to Request for Comments: Nationwide Workforce Program Docket No. PTO-C-2011-0066

Dear Under Secretary Kappos:

I write to express GE's support for the State of Connecticut's proposal to host a satellite office of the US Patent and Trademark Office (USPTO). Situated at the crossroads of a dynamic and productive region of the country, Hartford, Connecticut is a compelling choice for a USPTO satellite office.

Connecticut has a proud history of innovation and patent activity that continues to this day. Connecticut is at the center of gravity for northeast patent activity, As USPTO state and county-level data show, if that region within a 150 mile radius of Hartford, CT were its own state, it would be second only to California in the number of patent applications filed (57,594). Connecticut's economy is diverse and includes not just a mature insurance and financial services sector, but also a robust and entrepreneurial cluster of software and information technology companies, biopharmaceutical labs, medical device makers, aerospace and advanced manufacturers. In 2010, Connecticut ranked 8th among all states in the number of patents per 100,000 workers (U.S. Bureau of Labor Statistics).

As importantly, Hartford is at the center of patent activity in the Northeast and New England, and can access New York and Boston more conveniently than either can access each other. Hartford is an uncongested city easily accessible by plane, car, bus and train. In 2010, Bradley International Airport supported 5, 400,000 passengers. Hartford is at the intersection of I-91 and I-84, and a variety of train service provides easy access to the northeast. And while Connecticut offers competitive salaries with surrounding areas, Hartford's cost of living is less, as are the expenses associated with establishing a regional USPTO facility, than either New York City or Boston.

The economic impact of a USPTO satellite in Connecticut would be significant. A 2010 study by the Connecticut Technology Council concluded that Connecticut's job growth over the last 20 years has been the worst in the country ranking 48th between 1989 and 2009 and 29th between 1999 and 2009. In the recent recession Connecticut saw a significant decline in overall employment (2.9%) between 2008 and 2009, with employment stagnating below 2006 levels. Connecticut is now in need of a means to grow its employment base.

Our colleges and universities are world class, which are responsible for cutting-edge research and development and are an engine of entrepreneurial activity in the state. Twenty four of our colleges, universities, and research institutions offer engineering degrees. Among states, Connecticut ranks third in the percent of our population with advanced degrees, according to the US Census Bureau. Overall, Connecticut has one of the highest rates of educational attainment in the US. Specifically, Yale is developing an 8500 sq. ft. center to advance Yale's

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collaborative, hands-on, interdisciplinary engineering and design curriculum. The University of Connecticut is developing a Technology Park at the Storrs campus in collaboration with industry partners.

Connecticut offers a relatively low-cost location for a USPTO satellite. Hartford, Middletown and New Haven all have low-cost commercial space available in the amount necessary to support up to 250 employees. Hartford in particular has a large amount of vacant commercial space, improving the likelihood of negotiating favorable lease arrangements. Suitable space may be obtained in the 12-18/sq.ft range.

In light of the foregoing, a Hartford location would be an excellent way to meet the interests of the USPTO and the region's inventors and entrepreneurs, and so we commend the proposal by Connecticut to host such an office and thank you for your consideration.

Si ncerel y,

Mi chael Gni bus

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