Subject: Comments on Changes to Support 21st Century Strategic Plan

Dear USPTO,

The changes to 37 CFR 1.98 are an excellent idea, and they should be implemented. I would like to suggest additional paper saving ideas.

- 1. The changes should be expanded to all applications, and not just to those filed after June 30, 2003. This would continue to reduce the paper handling and storage load.
- 2a. For non-U.S. patents and patent application publications, these documents are available on many databases in image format (i.e., PDF or TIFF). Instead of submitting a paper copy of these documents, a CD could be submitted with image files of these documents. This would reduce paper handling and storage of these documents.
- 2b. Alternatively, patents and publications from the major patent offices are available in many databases. For documents from patent offices designated by the USPTO, these documents could be cited similar to the changes to 1.98. The documents could be cited in an Information Disclosure Statement, and the documents could be referenced from a database similar to the referencing of U.S. patents and patent application publications.
- 3. For other literature, these documents could be scanned in using available scanning equipment to convert the documents to an image format, such as PDF or TIFF. The image files could then be submitted on CD. Again this would reduce paper handling and storage.

Michael Morgan Reg. No. 42,906 Attorney BASF Corporation 26701 Telegraph Road Southfield, MI 48034-2442 Phone: 1-248-948-2355 Fax: 1-248-948-2093