



16 April 2018

The Honorable Charles Grassley
Chair, Committee on the Judiciary
135 Hart Senate Office Building
Washington, DC 20510

The Honorable Dianne Feinstein
Ranking Member, Committee on the Judiciary
331 Hart Senate Office Building
Washington, DC 20510

The Honorable Chris Coons
Committee on the Judiciary
127A Russell Senate Office Building
Washington, DC 20510

Dear Chairman Grassley, Ranking Member Feinstein, and Senator Coons:

We write in advanced of the Committee's 18 April 2018 hearing on Oversight of the U.S. Patent and Trademark Office to reiterate concerns we have expressed over the past two years with the Department of Commerce's implementation of Enterprise Services. We share the concerns expressed by Senators Grassley and Coons in several letters seeking information about this initiative, and specifically: 1) whether rigorous analysis has been undertaken to demonstrate that the services will meet the USPTO's unique needs and produce a sound return on the USPTO's investment in the standup costs and 2) whether required participation is consistent with the letter of the law and Congressional intent concerning the 1999 American Inventors Protection Act and 2011 Leahy-Smith America Invents Act.

The USPTO has already contributed millions of dollars to fund the initiative's standup costs, and we remain concerned that USPTO participation will be more burdensome than beneficial for the agency and its users. We hope that you will seek additional information about this matter during the hearing. Please let us know what we can do to be of help.

Sincerely,

Lisa K. Jorgenson
Executive Director
American Intellectual Property Law Association



Henry Hadad
President
Intellectual Property Owners Association



Etienne Sanz de Acedo
Chief Executive Officer
International Trademark Association

cc: Senate Judiciary Committee