

July 31, 2014

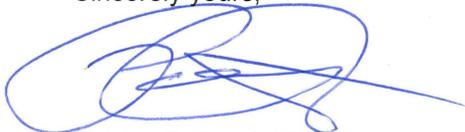
Re: Comments on the USPTO's *Guidance Memorandum for Determining Subject Matter Eligibility of Claims Reciting or Involving Laws of Nature, Natural Phenomena, & Natural Products*

As the Director of a technology management office at an academic medical and research institution, I support the position of the Association of University Technology Managers (AUTM), Council on Governmental Relations (COGR), Association of American Universities (AAU), and the Association of Public Land-Grant Universities (APLU) concerning the USPTO's *Guidance Memorandum for Determining Subject Matter Eligibility of Claims Reciting or Involving Laws of Nature, Natural Phenomena, & Natural Products*.

The mission of LSU Health Sciences Center – New Orleans is “to provide education, research, and public service through direct patient care and community outreach.” In partial fulfillment of this mission, University-created technologies are transferred to for-profit companies for their further research, development and commercialization. Such technologies include life science products, often purified from a natural source, and simple diagnostic assays. As a direct result of the overly broad and far reaching instructions in the *Guidance Memorandum*, such important technologies now find their patentability to be greatly limited. As patent protection is often the foundation of license agreements and follow-on industry sponsored research agreements, these new limitations stand to unnecessarily stifle technology transfer and research and development. Of most concern, the *Guidance Memorandum* has the potential to ultimately extend beyond the University, impacting the general public themselves, as certain university-discovered technologies will no longer be available for their benefit.

In summary, I support AUTM, COGR, AAU and APLU's position that the *Guidance Memorandum* has gone far beyond what the Supreme Court actually ruled in recent-patent eligibility cases, and encourage the USPTO to revise the Guidance appropriately to address these concerns.

Sincerely yours,



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