From: p1k2r3@gmail.com [mailto:p1k2r3@gmail.com] **On Behalf Of** Peter Rogan
Sent: Monday, September 28, 2009 9:04 PM
To: Fawcett, Susan
Subject: A0651–0024

As an inventor, I have provided sequence listings generated using the USPTO's Patent-In software to multiple patent attorneys for several patents and patent applications.
In almost every instance, the USPTO has found errors in those listing which necessitated correction and resubmission, despite the fact the listings were generated with the PTO's own software.

My comment pertains to the amount of time required to prepare a sequence listing. The PTO estimates it requires 6 minutes to 1 hr 20 minutes to gather, prepare and submit sequence listing to the USPTO.
It believe that this is a significant underestimate. One of my patents required nearly 500 sequences (eg US Pat No. 7014997), which required approximately 8 hrs to format for entry into patent-in. Another patent contained
numerous degeneracies in the sequences, each of which had to be verified separately (US Pat No. . Even with the use or development of bioinformatics software to generate input files suitable for patent-in, it is still necessary to verify the accuracy of the sequences to ensure that the software is working correctly. I am only referring to the time that I dedicated to this effort, not that of the patent attorney or his/her paralegal.

I would suggest that if you are trying to model the average time expended for preparation of sequence listing, it would be necessary to multiply your own estimates at least 10 fold.

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