



August 6, 2009

**By Email:** Nancy.Leigh@ic.gc.ca

Nancy P. Leigh  
Chef, Legislative, Regulatory and Policy Affairs  
Canadian Intellectual Property Office  
Patent Branch  
50 Victoria Street  
Gatineau, Québec  
K1A 0C9

Dear Ms. Leigh:

**Re: Proposed Amendments to the Patent Rules - Package No. 1  
as Pre-Published in the Canada Gazette Part 1 on July 11, 2009**

FICPI Canada wishes to thank the Canadian Intellectual Property Office for the opportunity to comment on the proposed amendments to the Patent Rules noted above.

As you know, FICPI (the Federation Internationale des Conseils en Propriété Industrielle), comprises more than 3500 intellectual property attorneys in private practice in 86 countries. FICPI Canada is a self-governing national association of FICPI and represents the interests of Canadian patent and trade mark professionals. Our membership includes senior professionals at most major Canadian intellectual property firms. Our clients span all types and sizes of businesses, including multi-national corporations, small and medium size enterprises, and individuals.

We note that the proposed amendments have been revised to address many of the concerns previously raised by FICPI Canada. We appreciate the consideration given to our comments.

The proposed amendments will offer a simpler alternative to the Declaration of Entitlement requirement which has caused considerable confusion and unnecessary expense to applicants in numerous cases since being introduced.

We therefore urge CIPO to take whatever steps may be available to have the proposed amendments to the Rules enacted and brought into force as quickly as possible.

Thank you again for the opportunity to provide comments. If CIPO has any questions about our position, please do not hesitate to contact the undersigned.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'R. Storey', with a long horizontal flourish extending to the right.

Robert B. Storey, President  
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(514) 871-2926

cc Barney deSchneider (by Email)