

August 31, 2009

Ms. Krista Pearce
Senior Legislation and Patent Policy Analyst
Industry Canada
50 Victoria Street
Gatineau, Quebec K1A 0C9
Canada

Dear Ms. Pearce:

Re: Comments Regarding Amendments to the *Patent Rules* and *Trade-Marks Regulations*

I understand the Examination Boards' desire to have more flexibility to control the patent agent examination and trade-mark agent examination process timeline and ensure that the exams are marked in a timely manner.

However I think that amending the *Patent Rules* and *Trade-Marks Regulations* to stipulate that the exam be conducted on an annual basis, without reference to the month in which they are to be written, is too broad. The proposed amended *Rules* and *Regulations* do not provide sufficient predictably as to when the examination will be set each year and therefore do not provide candidates with sufficient time to prepare for the examination.

In order to provide the Examination Boards' with more flexibility while still providing candidates with sufficient preparation time, I recommend amending the *Rules* and *Regulations* to include date ranges for the respective examinations.

For example, to amend section 14 of the *Patent Rules*, as follows:

- (14) (1) The Examining Board shall set and administer a qualifying examination for patent agents at least once in each year between March 1 and April 30.

For example, to amend section 20 of the *Trade-Marks Regulations*, as follows:

- (20) (1) The Examining Board shall set and administer a qualifying examination for trade-mark agents at least once each year between October 1 and November 30.

Yours very truly,

A handwritten signature in blue ink, reading "Ian P. Goodman". The signature is fluid and cursive, with the first name "Ian" and last name "Goodman" clearly distinguishable.

Ian P. Goodman