**From:** Kolakowski, John (Nokia-TECH/Herndon) <john.kolakowski@nokia.com>
**Sent:** Monday, October 8, 2018 4:50 PM
**To:** PSA Department <PSA@ansi.org>
**Cc:** IPRPC <iprpc@ansi.org>
**Subject:** comments on proposed revision to 3.1.2 of the ANSI patent policy within the ANSI Essential Requirements

Regarding the proposed change in 3.1.2 as detailed in ExSC_112_2018 and published in the September 7, 2018 ANSI Standards Action, Nokia states that ANSI hasn't provided any justification for this change. Implementing the change means that it is likely for some standards that assurances will need to be located at multiple locations, making it more difficult for interested persons to understand the relevant patent landscape for a standard. Furthermore, should an ASD cease to exist at some point in the future, implementers would have no place to look for identification of relevant SEPs for ANS produced by the defunct ASD. To avoid these problems, ANSI should continue to maintain a role as a clearinghouse for patent assurances in the interests of making things most efficient for interested parties, and the proposed language change should be rejected entirely.

If there is some legitimate reason to make this change that isn't yet articulated, ANSI could either use a transition period (ASDs must start following this procedure only for new ANS) or ANSI could transfer all currently held assurance copies back to the respective ASDs for each ANS so that there is a complete set available in one location. This, however, would not be a preferable course of action because it still would not solve the potential problem of implementers losing access to identification of SEPs described above if an ASD ceases to exist.

Regards,
John Kolakowski

**John Kolakowski**
**Nokia Technologies**
Senior IPR Licensing/Litigation Counsel
Head of IP Regulatory Affairs, North America