



December 26, 2025

Mr. Michael Kratsios  
Director  
U.S. Office of Science and Technology Policy  
1650 Pennsylvania Avenue, N.W.  
Washington, D.C. 20504

**Re: Office of Science and Technology Policy Notice of Request for Information:  
Accelerating the American Scientific Enterprise (Docket No. OSTP-  
TECH-2025-0100)**

Dear Director Kratsios:

Conservatives for Property Rights (CPR), a coalition of public policy organizations concerned with preserving and protecting private property rights, is pleased to respond to the Office of Science and Technology Policy's (OSTP) Notice of Request for Information (RFI) on Accelerating the American Scientific Enterprise (Docket No. OSTP-TECH-2025-0100).

CPR has long advocated for policies that foster U.S. competitiveness and technological innovation, of which the storied American scientific enterprise is a pillar.<sup>1</sup> Moreover, patents and intellectual property (IP) constitute the center of our innovation economy, as well as America's prosperity and national security. The two—the U.S. scientific enterprise and secure IP rights—are mutually dependent and mutually beneficial.

It is imperative that U.S. policy bolster and restore clear, secure, reliable, enforceable IP rights—including patent rights—if the American scientific enterprise is to accelerate. Regrettably, our scientific enterprise stands at risk of decelerating. This is in large part to U.S. policy that has increasingly weakened IP rights, especially for patents, over the past 20-plus years. The first Trump administration was an exception to that trend.<sup>2</sup>

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<sup>1</sup> <https://www.property-rts.org/competitiveness-and-property>

<sup>2</sup> <https://dailycaller.com/2024/12/11/advocacy-groups-urge-trump-admin-to-reverse-bidens-policies/>

As a member organization of the Bayh-Dole Coalition, CPR fully endorses its comments and recommendations submitted for this RFI.<sup>3</sup> CPR regards the Bayh-Dole Act as an American success story that has widely spread the benefits of commercializing IP.<sup>4</sup> This law fosters democratized technology transfer, which efficiently licenses patents to startups, small businesses, and other licensees, and has given rise to mature, substantial innovation ecosystems around research institutions large and small from big cities to small, rural locations—boosting local economies from coast to coast—not to mention practical benefits enjoyed by the American people.<sup>5</sup>

In addition, CPR urges the following policy and legislative changes in order to achieve significant acceleration of our nation’s scientific enterprise and the benefits that follow. Footnoted items should be considered as incorporated by citation.

- Ensure U.S. leadership in critical and emerging technologies, as recommended in CPR’s filing in the Joint Collaboration Initiative Regarding Standards (Docket No. PTO-C-2023-0034), comments regarding the Draft Policy Statement on Licensing Negotiations and Remedies for Standards-Essential Patents Subject to Voluntary F/RAND Commitments (Docket No. ATR-2021-0001), coalition letters, a monograph, and articles.<sup>6</sup>
- Strengthen the democratization of federal technology transfer of federal inventions and of discoveries and inventions made by grantees with federal research funding, as discussed in CPR’s response to the National Institute of Standards and Technology’s (NIST) RFI on Federal Technology Transfer Authorities and Processes (Docket No. 180220199-819-0).<sup>7</sup>

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<sup>3</sup> <https://bayhdolecoalition.org/wp-content/uploads/2025/12/Bayh-Dole-Coalition-Comments-on-OSTP-RFI-re-Accelerating-American-Scientific-Enterprise.pdf>

<sup>4</sup> <https://econstandard.com/story/breaking-the-law-that-led-to-7-739-patents-and-1-000-startups-in-2022-alone>

<sup>5</sup> James R. Edwards, Jr., *To Invent Is Divine: Creativity and Ownership* (Fidelis Publishing, 2025), pp. 236-238.

<sup>6</sup> [https://www.property-rts.org/\\_files/ugd/651e0c\\_020753474d9c4d7a9664f629f6b9fe8b.pdf](https://www.property-rts.org/_files/ugd/651e0c_020753474d9c4d7a9664f629f6b9fe8b.pdf), [https://www.property-rts.org/\\_files/ugd/651e0c\\_cfa572d4025a4b2ab02648e0b3001e6c.pdf](https://www.property-rts.org/_files/ugd/651e0c_cfa572d4025a4b2ab02648e0b3001e6c.pdf), [https://www.property-rts.org/\\_files/ugd/651e0c\\_1010f4d144bb4a2584a58f326845d8ff.pdf](https://www.property-rts.org/_files/ugd/651e0c_1010f4d144bb4a2584a58f326845d8ff.pdf), [https://www.property-rts.org/\\_files/ugd/651e0c\\_5b1ce9eb0a1f41508228a71ca8d3a783.pdf](https://www.property-rts.org/_files/ugd/651e0c_5b1ce9eb0a1f41508228a71ca8d3a783.pdf), [https://www.property-rts.org/\\_files/ugd/651e0c\\_9177229aa90e49a2960c6b06e83bcd88.pdf](https://www.property-rts.org/_files/ugd/651e0c_9177229aa90e49a2960c6b06e83bcd88.pdf), [https://www.property-rts.org/\\_files/ugd/651e0c\\_b3442c0f8fc04c36953625f78d5e440e.pdf](https://www.property-rts.org/_files/ugd/651e0c_b3442c0f8fc04c36953625f78d5e440e.pdf), [https://www.realclearpolicy.com/articles/2024/07/25/how\\_americas\\_democratic\\_foundation\\_promotes\\_innovation\\_and\\_us\\_security\\_1047077.html](https://www.realclearpolicy.com/articles/2024/07/25/how_americas_democratic_foundation_promotes_innovation_and_us_security_1047077.html)

<sup>7</sup> [https://www.property-rts.org/\\_files/ugd/651e0c\\_633d54fc2e6441b88fb6f60dc7aa5b11.pdf](https://www.property-rts.org/_files/ugd/651e0c_633d54fc2e6441b88fb6f60dc7aa5b11.pdf)

- Prohibit government departments and agencies from competing with or displacing private sector-driven and private sector-led applied research or commercialization, as a coalition letter discusses.<sup>8</sup>
- Erect policy barriers that restrict government departments and agencies, especially the Federal Trade Commission, and courts from weaponizing antitrust as discussed in a statement regarding just such an instance,<sup>9</sup> and protect any patent-owning private sector entities involved in invention, commercialization, standardization, or related aspects of U.S. technology leadership.
- Negotiate strong intellectual property protections in trade agreements, as a coalition including CPR discussed in correspondence with the U.S. Trade Representative and recent articles.<sup>10</sup>
- Withdraw proposals and repeal policies that cast shadows of uncertainty, unreliability, or otherwise threaten the secure, full benefits from the fruits of one's intellectual labor and investments. These include government expropriation of some or all of one's resources he or she put at risk in the pursuit of knowledge, discovery, or invention in hopes of a return on investment.<sup>11</sup> This action should include clear, immediate, total withdrawal of existing and proposed government price controls, a valuation tax on patents, and a government stake in an institution's patent royalties and in private companies.<sup>12</sup> This action will ensure practical use of basic research's learnings and the private sector's confidence that the free enterprise and IP systems are reliable so these entities can efficiently allocate resources to America's benefit.

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<sup>8</sup> [https://www.property-rts.org/files/ugd/651e0c\\_b2bbaacee643401e9666c0ce5400bdfb.pdf](https://www.property-rts.org/files/ugd/651e0c_b2bbaacee643401e9666c0ce5400bdfb.pdf)

<sup>9</sup> [https://www.property-rts.org/files/ugd/651e0c\\_5de5de6ad3b94da6b8e66babe71b25ba.pdf](https://www.property-rts.org/files/ugd/651e0c_5de5de6ad3b94da6b8e66babe71b25ba.pdf)

<sup>10</sup> [https://www.property-rts.org/files/ugd/651e0c\\_20fa4bab315c419b872261590a8e90ed.pdf](https://www.property-rts.org/files/ugd/651e0c_20fa4bab315c419b872261590a8e90ed.pdf), [https://www.thecentersquare.com/opinion/article\\_c731dd42-bf6d-4fe0-944b-8e3cc989c053.html](https://www.thecentersquare.com/opinion/article_c731dd42-bf6d-4fe0-944b-8e3cc989c053.html), <https://www.greenvilleonline.com/story/opinion/contributors/2025/04/25/opinion-keep-foreign-ip-thieves-out-of-south-carolina/83249425007/>, <https://www.foxbusiness.com/politics/free-market-groups-warn-trump-british-patent-plan-would-weaken-us-tech-edge-empower-china>

<sup>11</sup> <https://www.property-rts.org/post/america-s-250th-an-opportunity-to-revive-the-founders-ip-vision>, <https://www.property-rts.org/post/going-where-free-enterprise-and-property-rights-fear-to-tread>

<sup>12</sup> <https://econstandard.com/story/ira-and-mfn-two-sides-of-the-same-coin>, <https://www.property-rts.org/post/going-where-free-enterprise-and-property-rights-fear-to-tread>, <https://townhall.com/columnists/jamesedwards/2025/09/25/taxing-patents-will-put-a-dangerous-chokehold-on-us-innovation-n2663910>, [https://www.property-rts.org/files/ugd/651e0c\\_7bbc8647f7aa47209df250443f1af651.pdf](https://www.property-rts.org/files/ugd/651e0c_7bbc8647f7aa47209df250443f1af651.pdf), [https://www.property-rts.org/files/ugd/651e0c\\_77dd2ce6137940f3b5040f10a6ee94e0.pdf](https://www.property-rts.org/files/ugd/651e0c_77dd2ce6137940f3b5040f10a6ee94e0.pdf), [https://www.property-rts.org/files/ugd/651e0c\\_a23f1d1c5a72405fb53d7614fdd71079.pdf](https://www.property-rts.org/files/ugd/651e0c_a23f1d1c5a72405fb53d7614fdd71079.pdf), [https://www.property-rts.org/files/ugd/651e0c\\_1281c702430a411fbb3df080efcca8d6.pdf](https://www.property-rts.org/files/ugd/651e0c_1281c702430a411fbb3df080efcca8d6.pdf), [https://www.property-rts.org/files/ugd/651e0c\\_e29164efab374bd59dd5efb761e870df.pdf](https://www.property-rts.org/files/ugd/651e0c_e29164efab374bd59dd5efb761e870df.pdf)

- Take a favorable position on certain bipartisan legislation<sup>13</sup> that would restore essential, foundational facets that characterized America's successful, historical patent system: the RESTORE Patent Rights Act (S. 708, H.R. 1574),<sup>14</sup> Patent Eligibility Restoration Act (S. 1546, H.R. 3152),<sup>15</sup> and PREVAIL Act (S. 1553, H.R. 3160).<sup>16</sup> Enacting legislation would ensure a legacy that outlives the current administration.

Thank you for taking our input into consideration. Not only would our recommendations, if acted upon, help accelerate the American scientific enterprise, they would help inventors and patent owners, as well as safeguard the rights our Founders recognized to be crucial to our nation's progress, prosperity, and independence.

Sincerely,

James Edwards, Ph.D.  
Founder and Executive Director  
Conservatives for Property Rights

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<sup>13</sup> [https://www.realclearpolicy.com/articles/2024/12/30/stronger\\_patent\\_protection\\_will\\_bolster\\_economic\\_and\\_national\\_security\\_1081471.html](https://www.realclearpolicy.com/articles/2024/12/30/stronger_patent_protection_will_bolster_economic_and_national_security_1081471.html), <https://www.nationalreview.com/news/conservative-groups-push-senators-to-pass-bipartisan-patent-protection-laws/>

<sup>14</sup> [https://www.property-rts.org/files/ugd/651e0c\\_fa51d5035bcb4d8e9179cc9bf87d723e.pdf](https://www.property-rts.org/files/ugd/651e0c_fa51d5035bcb4d8e9179cc9bf87d723e.pdf)

<sup>15</sup> [https://www.property-rts.org/files/ugd/651e0c\\_b6d018c517224c62ac74865def4a9324.pdf](https://www.property-rts.org/files/ugd/651e0c_b6d018c517224c62ac74865def4a9324.pdf)

<sup>16</sup> [https://www.property-rts.org/files/ugd/651e0c\\_e08b4d5198b042b8a9e2b226de6548a3.pdf](https://www.property-rts.org/files/ugd/651e0c_e08b4d5198b042b8a9e2b226de6548a3.pdf)