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October 8, 1986

FEDERAL EXPRESS

Norman Latker, Esq.
Director, Federal Technology
Management Policy Division
US Department of Commerce
Room H-4837
14th and Constitution Avenues
Washington, DC 20230

Re: Interim Final Rule
for 37 CFR Part 401

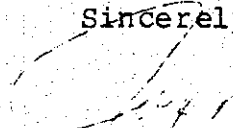
Dear Norm:

We note that some agencies have taken the position that the Interim Final Rule as published in the Federal Register on July 14, 1986, at 25508 is not in force and that OMB Circular A-124 is still being used for grants and contracts from these agencies.

Other agencies have adopted the provisions of the Interim Final Rule for grants and contracts now being negotiated.

A legal opinion from the Department of Commerce on the effective date of applicability and the enforceability of the Interim Rule would enable the University to take a coherent stance in our negotiations with all federal agencies. Please let us have your response at your earliest convenience, as current negotiations will be affected by the opinion we seek.

Sincerely yours,


Roger G. Ditzel
Director

RGD:BBD:eav