United States Patent and Trademark Office

Office of the Chief Financial Officer

USPTO-OP-013.v6.0 (1/2026)

LIMITED SOURCES JUSTIFICATION (LSJ)
(BRAND NAME)
(GSAR 538.7104-4 and GSAR 538.7104-3 (when applicable))

SECTION I. COMPLETED BY THE PROGRAM OFFICE

Program Office: Office of Patent Administrative Center	**Program Office POC:** Kristen McCormick
Title of Procurement: Artificial Intelligence (AI) Assistant Tools Patent Examination Modernization (Patent AI)	**Acquisition Package #:** ACQ-26-0926
Estimated Value (including options) $23,000,000.00	
Contracting Officer: David Sheppard	**Contracting Officer Phone:** (571) 272-3266
Vendor Name (if applicable): Four Points Technology, LLC	**Contract or Order # (if applicable):** TBD

The following LSJ has been prepared to meet the requirements of Federal Acquisition Regulation GSAR 538.7104-4 and/or 538.7104-3.

1. **Program Office Anticipated Type of LSJ (select from the drop-down box)**

   o Brand Name and Sole Source (limited to one vendor who can fulfill the brand name (GSAR 538.7104)

2. **Identification of the agency and contracting activity**

   United States Patent and Trademark Office (USPTO)
   Office of the Chief Financial Officer (OCFO)
   Office of Procurement (OP)
   Alexandria, VA

3. **Nature and/or description of the action requiring approval**

   The USPTO Office of Procurement (OP) intends to negotiate and award a firm-fixed-price order to Four Points Technology, LLC (Four Points) via a single-award Blanket Purchase Agreement (BPA) #1333-LB-24-A-00001with the United States Census Bureau issued pursuant to the authority of Federal Acquisition Regulation (FAR) General Services Administration (GSA) 8.405-3 – Blanket Purchase Agreements (BPAs), under General Services Administration (GSA) Multiple Award Schedule (MAS). This BPA will allow access to the patent examination tool developed by Google Cloud Platform (GCP) and Patlytics, Inc (Google/Patlytics).

4. **Description of the supplies or services required and the estimated value thereof**

   The USPTO is responsible for providing patent examiners with the resources needed to study each patent application and to investigate relevant prior art and legal issues related to the claimed subject matter.

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The USPTO requires an AI solution that complies with federal regulations, laws, and executive orders governing the development and use of AI in the federal government. The USPTO must be able to explain and generate a full and clear record to explain how prosecution decisions are made. Examination augmented by an automated decision process must therefore ensure full algorithmic transparency to ensure that any proposed algorithmic option is fully explainable, free of bias, and transparent to the public.

The overall vision for Patent AI is to increase the efficiency and quality of the patent examination process by the use of additional AI-based tools that can assist in the completion of specific examination-related tasks, thereby ensuring high efficiency and consistency of the work product.

The purpose of the Patent AI for Search and Office Action contract is to acquire a Software as a Service (SaaS) tool that aids and enhances USPTO examiners' search and office action creation capabilities, for applications that have completed pre-examination processing and are ready for examination

Period of Performance:

Base Year: June 1, 2026 – May 31, 2027
Option Year 1: June 1, 2027 – May 31, 2028

Estimated Value: $23,000,000.00

5. Any other facts supporting the justification

In accordance with the statement of work (SOW), the vendor must deliver a FedRAMP certified SaaS solution for an AI Search and Office Action Creation tool, or be able to achieve FedRAMP authorization, as a stand-alone SaaS or operating entirely within a FedRAMP authorized PaaS environment within the expedited timeline required by the USPTO. The tool presented by Google/Patlytics is the only tool capable of achieving these goals by the end of Fiscal Year 26 and be usable by the end of June 2026 as required by the USPTO.

SECTION II. COLLABORATION BETWEEN THE PROGRAM OFFICE AND OP

6. Adjudicated Type of LSJ (select from the drop-down box)

o Brand Name and Sole Source (limited to one vendor who can fulfill the brand name (GSAR 538.7104)

7. Authority and supporting rationale: Authority and supporting rationale (see GSAR 538.7104) and, if applicable, a demonstration of the proposed vendor's unique qualifications to provide the required supply or service.

☒ This acquisition is conducted under the authority of GSAR 538.7104. Consideration of schedule vendors will be restricted only to the item peculiar to one manufacturer as provided in GSAR 538.7104-4 [see GSAR 538.7103-2(a)(4), 538.7103-2(b), and 538.7103-3(a)(2)].

Proposed Vendor: Four Points Technology, LLC – a reseller of Google/Patlytics

The Google/Patlytics tool, through Four Points, is the only tool that can fulfill the Government's requirement. USPTO requires an AI tool to assist in Patent Search and Office Action Creation that are/can be FedRAMP certified to allow implementation in June 2026. While there are other AI solutions being developed, the Google/Patlytics tool is the only tool that is currently available as a usable SaaS solution that can meet FedRAMP deadlines and the aggressive timeline for implementation. The new AI tool is essential to the agency's strategy to improve patent pendency and award to any other brand would delay patent examination and keep new tools that could improve pendency out of examiner's hands.

8. Market Research: Description of the market research conducted among schedule holders and the results, or a statement of the reason market research was not conducted.

A request for information (RFI) was posted to SAM.gov on June 4, 2025 as preliminary market information gathering which the USPTO used to determine which vendors were most likely to successfully meet the USPTO's needs at low or no cost. The RFI closed on July 11, 2025 with 174 responses.

The USPTO reviewed all responses and determined that six (6) companies could have the capabilities to achieve the required outcome of the project. Each demonstrated strengths in particular workstreams; Search Reporting, Office Action Review, and Office Action Creation. A request for a proof of concept (PoC) was sent to IP.com, IP Copilot, Solve Intelligence, Amazon Web Service (AWS), Booz Allen, and Google on October 22, 2025 as shown in the table below.

Search Reporting	Office Action Review	Office Action Creation
IP.com	Solve Intelligence	Booz Allen
Google	Amazon Web Services	IP Copilot
		Amazon Web Services

During the week of October 27, 2025, a Q&A session was held with each vendor to answer questions regarding the requirement and desired tool. A PoC demonstration was presented by each company during the week of December 1, 2025. Google, in combination with Patlytics, showed the most promising tool for the Search Reporting workstream while including key components required for the Office Action Creation workstream. As a result, a second PoC demonstration with Google/Patlytics was requested for December 16, 2025.

On December 23, 2025, IP.com, Booz Allen, & IP Copilot were notified the USPTO would not be requesting any additional information. AWS & Solve Intelligence continued to be assessed for Office Action Review while Google/Patlytics continued to be assessed for Search Reporting and Office Action Creation.

On January 15, 2026, the Patents team notified OP they would like to proceed with trial licenses of the Google/Patlytics tool. The trial began on January 30, 2026 with training by the Google/Patlytics team being provided to the Patents team on February 9, 2026. The trial period ended on March 6, 2026.

The Google/Patlytics tool provides comprehensive prior-art search capabilities, automated claim mapping presented in a claim-to-citation chart that supports 35 U.S.C. 102, 103, and 112 analyses, and documented quality metrics for validating search and Office Action outputs. In addition, the

vendor maintains a SOC 2 Type II attestation for information security controls and will be able to achieve FedRAMP certification within the required timeframe.

9. Agency Actions: Actions if any, the agency may make to remove or overcome any barriers that led to the restricted consideration before any subsequent acquisition.

Given the rapid and continuous evolution of the artificial-intelligence marketplace, the Government will limit the period of performance to a base year with one option year. This limited duration preserves the USPTO's flexibility to continue market research, evaluate emerging AI solutions, and, if a suitable capability is identified, transition to a competitive procurement with minimal disruption to operations.

SECTION III. REVIEW AND APPROVAL

1. Technical Certification

By signature below, the Technical Representative certifies that the supporting data necessary to form the basis for this justification is accurate and complete to the best of their knowledge and belief. Furthermore, the Technical Representative certifies that the justification has been adjudicated by the Program Office and OP.

[redacted]

Technical Representative Digital Signature

2. Contracting Officer's Certification

By signature below, the ordering activity Contracting Officer certifies that this justification is accurate and complete to the best of their knowledge and belief.

[redacted]

Contracting Officer's Digital Signature

3. Office of General Law (OGL) Counsel (required for actions valued >$10M)

N/A ☐

By signature below, the ordering activity OGL Counsel deems this justification legally sufficient.

[redacted]

Office of General Law Counsel's Digital Signature

4. **Level above Review (LAR) (see PM 2017-01 for definition)** (required for actions at all dollar values except when LAR serves in another review/approval role)

   N/A ☐

   By signature below, the ordering activity LAR certifies that this justification is accurate and complete to the best of their knowledge and belief.

   [redacted]

   Level Above Review's Digital Signature

Section IV. Attachments [As Required]

N/A