Attorney Docket: COX-714IPR

### IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

Inter Partes Review Case No. IPR2015-\_\_\_\_\_

Inter Partes Review of: U.S. Patent No. 7,907,714

Issued: March 15, 2011

To: Paul G. Baniak et al.

For: Profile Management System Including User Interface for Accessing and Maintaining Profile Data of User Subscribed Telephony Services

# PETITION FOR *INTER PARTES* REVIEW OF USPN 7,907,714

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Dated: May 19, 2015

# **Table of Contents**

			Page
I.	Ma	ndatory Notices Under 37 C.F.R. § 42.8(a)(1)	1
	A.	Real Party-In-Interest under 37 C.F.R. § 42.8(b)(1)	1
	B.	Related Matters under 37 C.F.R. § 42.8(b)(2)	1
	C.	Lead and Back-Up Counsel under 37 C.F.R. § 42.8(b)(3)	1
	D.	Service Information under 37 C.F.R. § 42.8(b)(4)	2
	E.	Proof of Service on the Patent Owner	2
II.	Pay	ment of Fees Under 37 C.F.R. § 42.103	2
III.	Rec	quirements for Inter Partes Review under 37 C.F.R. § 42.104	3
	A.	Grounds for Standing under 37 C.F.R. § 42.104(a)	3
	В.	Identification of Challenge under 37 C.F.R. § 42.104(b) and Statement of Precise Relief Requested	3
	C.	Threshold Requirement for <i>Inter Partes</i> Review Under 37 C.F.R. § 42.108(c)	4
IV.	Ove	erview of the Technology and the '714 Patent	4
	A.	The Technology	4
	B.	Brief Description	5
	C.	Summary of the Prosecution History of the '714 Patent	6
	D.	Applicants Have Not Demonstrated Diligence in Reducing the Alleged Invention to Practice, So Will Be Unable to Swear Behind the Cited Prior Art	7
	1.		10
		Buhrmann	11
	3.	<i>An</i>	11
	4.	Elliott	13
	5.	Boulware	14
	6.	Bayless	14
	7.	Beck	15
V.	Lev	vel of Ordinary Skill in the Art	16
VI.	Cla	ims 1-22 of the '714 Patent are Unpatentable	16

VII. Conclusion		
D.	Claims 1-7, 13-17, and 22 are Anticipated by <i>Elliott</i> , claim 10 is rendered obvious by <i>Elliott</i> in view of <i>Bayless</i> , and claims 14-15 and 21-22 are rendered obvious by <i>Elliott</i> in view of <i>Beck</i>	52
C.	Claims 1-7, 11, and 13-17 are Anticipated by <i>An</i> , claim 10 is rendered obvious by <i>An</i> in view of <i>Bayless</i> , and claims 14-15 and 21-22 are rendered obvious by <i>An</i> in view of <i>Beck</i>	39
В.	Claims 1-7, 12-17, and 20 are Anticipated by <i>Buhrmann</i> , claims 8-9 and 18-19 are rendered obvious by <i>Buhrmann</i> in view of <i>Boulware</i> , claim 10 is rendered obvious by <i>Buhrmann</i> in view of <i>Bayless</i> , and claims 14-15 and 21-22 are rendered obvious by <i>Buhrmann</i> in view of <i>Beck</i> .	27
A.	Claims 1-5, 7, 13-15, 17, and 22 are Anticipated by <i>Blumhardt</i> , claims 8-9 and 18-19 are rendered obvious by <i>Blumhardt</i> in view of <i>Boulware</i> , claim 10 is rendered obvious by <i>Blumhardt</i> in view of <i>Bayless</i> , and claims 14-15 and 21-22 are rendered obvious by <i>Blumhardt</i> in view of <i>Beck</i> .	16

# **Table of Exhibits**

Exhibit	Description	Publication Date or Filing Date	Type of Prior Art (35 U.S.C.)
1001	USPN 7,907,714 (the "'714 patent") (patent under <i>Inter Partes</i> Review)	Jul. 21, 2006	N/A
1002	The file history for the '714 patent	N/A	N/A
1003	USPN 5,629,978 to Blumhardt <i>et al.</i> (" <i>Blumhardt</i> ")	Feb. 28, 1994	102(e)
1004	USPN 5,903,845 to Buhrmann et al. ("Buhrmann")	Jun. 4, 1996	102(e)
1005	USPN 6,031,904 to An et al. ("An")	June 19, 1997	102(e)
1006	U.S. Patent Appl. No. 60/028,760 to An et al. ("An Provisional")	Oct. 23, 1996	102(e)
1007	USPN 6,335,927 to Elliott <i>et al.</i> ("Elliott")	Nov. 18, 1996	102(e)
1008	USPN 5,757,899 to Boulware <i>et al.</i> ("Boulware")	Jul. 21, 1995	102(e)
1009	USPN 5,754,636 to Bayless <i>et al.</i> ("Bayless")	Nov. 1, 1994	102(e)
1010	USPN 5,883,946 to Beck <i>et al.</i> ("Beck")	Nov. 27, 1996	102(e)
1011	Supplemental Declaration of Terry L. Vieth Pursuant to 37 C.F.R. § 1.131, for U.S. Patent Appl. No. 09/050,986	Aug. 11, 2003	N/A
1012	Second Supplemental Declaration of Terry L. Vieth Pursuant to 37 C.F.R. § 1.131, for U.S. Patent Appl. No. 10/761,382	Jun. 7, 2004	N/A
1013	Third Supplemental Declaration of Terry L. Vieth Pursuant to 37 C.F.R. § 1.131, for U.S. Patent Appl. No. 10/761,382	Mar. 20, 2006	N/A
1014	Declaration of Professor Nader Mir,	N/A	N/A

Exhibit	Description	Publication Date or Filing Date	Type of Prior Art (35 U.S.C.)
	Ph.D. in Support of Request for <i>Inter</i> Partes Review of the '714 Patent		

Through counsel, real party-in-interest Cox Communications, Inc.

("Petitioner" or "Cox") hereby petitions for *Inter Partes* Review ("IPR") under 35

U.S.C. §§ 311-319 and 37 C.F.R. § 42 of claims 1-22 of U.S. Patent 7,907,714

(Ex. 1001) ("the '714 patent"). This Petition shows that there is a reasonable likelihood that Petitioner will prevail in establishing that at least one of these claims is unpatentable, and should be canceled.

### I. MANDATORY NOTICES UNDER 37 C.F.R. § 42.8(A)(1)

### A. Real Party-In-Interest under 37 C.F.R. § 42.8(b)(1)

Petitioner, Cox Communications, Inc., is the real party-in-interest for the instant petition.

### B. Related Matters under 37 C.F.R. § 42.8(b)(2)

The following pending matter where the '714 patent has been asserted against Petitioner would affect, or be affected by, a decision in this proceeding: AT&T Intellectual Property I, L.P. and AT&T Intellectual Property II, L.P. v. Cox Communications, Inc. et al., Civil Action No. 14-1106-GMS, filed on August 28, 2014 in the U.S. District Court for the District of Delaware.

## C. Lead and Back-Up Counsel under 37 C.F.R. § 42.8(b)(3)

Petitioner provides the following designation of counsel.

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### D. Service Information under 37 C.F.R. § 42.8(b)(4)

Cox may be served at the lead counsel address provided in Section I.C. of this Petition.

### E. Proof of Service on the Patent Owner

As identified in the attached Certificate of Service, a copy of the present Petition, in its entirety, including all exhibits and a power of attorney, is being served by EXPRESS MAIL® to AT&T Legal Department – GB, Attn: Patent Docketing, Room 2A-207, One AT&T Way, Bedminster, New Jersey 07921.

## F. Power of Attorney

A power of attorney is being filed with the designation of lead counsel in accordance with 37 C.F.R. § 42.10(b).

# II. PAYMENT OF FEES UNDER 37 C.F.R. § 42.103

The undersigned authorizes the Director to charge the fee set forth in 37C.F.R. § 42.15(a), as required by 37 C.F.R. § 42.103, to Deposit Account No. 50-3081. The undersigned further authorizes payment for any additional fees that might be due in connection with this Petition to be charged to the above referenced deposit account.

# III. REQUIREMENTS FOR *INTER PARTES* REVIEW UNDER 37 C.F.R. § 42.104

## A. Grounds for Standing under 37 C.F.R. § 42.104(a)

Petitioner certifies that the '714 patent is eligible for *Inter Partes* Review and further certifies that Petitioner is not barred or otherwise estopped from challenging the identified claims on the grounds identified within the present petition.

# B. Identification of Challenge under 37 C.F.R. § 42.104(b) and Statement of Precise Relief Requested

Petitioner requests *Inter Partes* Review of claims 1-22 of the '714 patent on the grounds set forth in the table below and requests that each of the claims be found unpatentable. An explanation of how claims 1-22 are unpatentable under the statutory grounds identified below, including the identification of where each element is found in the prior art patents or publications and the relevance of the prior art reference, is provided in the form of detailed claim charts. Additional explanation and support for each ground of rejection is set forth in the Declaration of Dr. Nader Mir. (*See* Ex. 1014.)

Ground	'714 Patent Claims	Basis for Rejection
A(1)	1-5, 7, 13-15, 17, and 22	Blumhardt (§102)
A(2)	8-9, 18-19	Blumhardt in view of Boulware (§103)
A(3)	10	Blumhardt in view of Bayless (§103)
A(4)	14-15, 21-22	Blumhardt in view of Beck (§103)
B(1)	1-7, 12-17, and 20	Buhrmann (§102)
B(2)	8-9, 18-19	Buhrmann in view of Boulware (§103)

B(3)	10	Buhrmann in view of Bayless (§103)
B(4)	14-15, 21-22	Buhrmann in view of Beck (§103)
C(1)	1-7, 11, and 13-17	An (§102)
C(2)	10	An in view of Bayless (§103)
C(3)	14-15, 21-22	An in view of Beck (§103)
D(1)	1-7, 13-17, and 22	Elliott (§102)
D(2)	10	Elliott in view of Bayless (§103)
D(3)	14-15, 21-22	Elliott in view of Beck (§103)

# C. Threshold Requirement for *Inter Partes* Review Under 37 C.F.R. § 42.108(c)

An IPR should be instituted when there is a "reasonable likelihood that the requester will prevail with respect to at least one of the claims challenged." 35 U.S.C. § 314(a). This Petition meets the threshold. In particular, as set forth herein, each limitation of the challenged claims is disclosed or suggested by the prior art references. Moreover, where applicable, this Petition sets forth reasons why a person of ordinary skill in the art would be motivated to combine the references.

# IV. OVERVIEW OF THE TECHNOLOGY AND THE '714 PATENTA. The Technology

As Dr. Mir explains, a person of ordinary skill in the art at the time of the purported invention of the '714 patent would be aware of existing databases for various purposes in telecommunication. In particular, messaging system databases associated with subscribers in telephone networks were well-known in 1997. For

example, service control point (SCP) was known to one of ordinary skill in the art in 1997 as a large database in the publicly-switched telephone network (PSTN). (See Ex. 1014, ¶ 45.) The SCP is a node of the Signaling System 7 network, which provides call control signaling. When a toll-free 800 number is requested, for example, the SCP finds the location address of the destination service switching point (SSP) to which the call should actually be sent. (See id.)

### **B.** Brief Description

The '714 patent is directed to the abstract concept of accessing and maintaining a telephone service subscriber's profile data that is stored on a network database. (*See* Ex. 1001, 1:32-35.) It purports to improve upon this basic functionality by providing a user interface on a computer for the subscriber to access and maintain their profile data. (*See id.*, 3:63-67; 4:7-10.) The processing steps in the method of claim 1 recite simple, well-known concepts: receiving a subscriber request to view subscriber profile data; retrieving the subscriber profile data from the network; forwarding the subscriber profile data back to the subscriber for viewing; receiving a subscriber request to update the subscriber profile data; and forwarding the updated profile data to the network. (*See id.*, 15:58-16:13.)

The dependent claims of the '714 patent add nothing beyond well-known, fundamental features of computing and telephony, such as: "a server" (*see* claim 4),

"a graphical user interface" (see claim 5), "positive identification" (see claim 6), "a tele-communications network" (see claim 7), and so on.

### C. Summary of the Prosecution History of the '714 Patent

The Application was filed on July 21, 2006, claiming priority to U.S. Provisional Pat. App. No. 60/042,680 (the "Provisional Application"), which was filed on April 3, 1997. (*See* Ex. 1001.) On May 26, 2010, the Examiner issued a non-final action rejecting all of the claims on the ground of nonstatutory obviousness-type double patenting. The Examiner found all claims except 10 and 12 anticipated by U.S. 5,915,008 (Dulman), and claims 10 and 12 obvious over Dulman either alone or in view of US 5,396,546 (Remillard). (Ex. 1002, pp. 85-89.)

Applicants responded by filing a terminal disclaimer to overcome the double patenting rejection. (Ex. 1002, pp. 96-97.) Yet they made no technical arguments against the anticipation or obviousness rejections. Rather, they referenced declarations and exhibits submitted in earlier, related applications that purported to establish conception by the Applicants prior to October 4, 1995, the prior art date of Dulman, along with diligence in reducing the purported invention to practice. (Ex. 1002, p. 94.)

The Examiner accepted the declaration as establishing conception and diligence, thereby mooting the Section 102 and 103 rejections. (Ex. 1002, p. 108.)

A Notice of Allowance was issued, and the Application issued as the '714 patent on March 15, 2011.

# D. Applicants Have Not Demonstrated Diligence in Reducing the Alleged Invention to Practice, So Will Be Unable to Swear Behind the Cited Prior Art

A reference with an earlier Section 102(a) or 102(e) date can be removed as prior art if an applicant can demonstrate conception of the claimed invention before that "critical date," coupled with diligence in reducing the invention to practice. MPEP § 2138.06. An applicant must prove diligence throughout the entire "critical period" from just before that critical date until either an actual or constructive reduction to practice. MPEP § 2138.06; see also *Kendall v. Searles*, 173 F.2d 986, 993, 81 USPQ 363, 369 (CCPA 1949) (requiring evidence of diligence to be "specific as to dates and facts"). In fact, courts have found that a lack of activity on as few as *two days* can be fatal to a claim of diligence. *In re Mulder*, 716 F.2d 1542, 1545, 219 USPQ 189, 193 (Fed. Cir. 1983).

During prosecution of the '714 patent, AT&T attempted to demonstrate diligence through a reduction to practice supposedly evidenced by an April 5, 1996 press release discussing "Positive ID," a then-forthcoming product. (*See* Ex. 1011.) But for there to be an actual reduction to practice, the claimed invention must have been "sufficiently tested to demonstrate that it will work for its intended purpose." *Scott v. Finney*, 34 F.3d 1058, 1062 (Fed. Cir. 1994). A date-redacted memorandum purportedly authored by named inventor Terry Vieth "immediately

Applicants had *not* reduced to practice, by that time, the user interface for viewing subscriber profile data, as required by the claims of the '714 patent. (*See* Ex. 1012, p. 2, .) To the contrary, the memorandum highlights "Profile Management System/PC Interface requirements" as an "Open Issue," noting that "requirements have not been written for the PC Interface" and cautioning that "at this time, there are many unanswered questions regarding the PC Interface." (Ex. 1012, pp. 4, 26.)

AT&T must therefore show diligence from before February 28, 1994—the priority date of *Blumhardt*, the earliest prior art reference cited in this Petition—through a reduction to practice, which could not occur until after the "many unanswered questions about the PC interface" were resolved and the system sufficiently tested. The evidence submitted by Applicants during prosecution shows that they are unlikely to be able to do so. In particular, Applicants attempted to establish diligence by referring to declarations filed by Vieth in related applications. According to Vieth, the claimed invention of the parent applications was conceived "prior to October 4, 1995," and was discussed at three meetings that followed on January 11, 1996; January 22, 1996; and April 15,

1996.<sup>1</sup> (Ex. 1013, p. 2.)

These meetings are all the evidence of diligence that Applicants mustered. But even if conception occurred *just* prior to October 4, 1995, three meetings over a critical period of several months clearly does not establish the requisite diligence "throughout the entire critical period." *Monsanto Co. v. Mycogen Plant Sci.*, Inc., 261 F.3d 1356, 1369 (Fed. Cir. 2001). While "there need not necessarily be evidence of activity on every single day if a satisfactory explanation is evidenced," *id.*, Applicants' evidence fails to identify activity, or any explanation for the lack thereof, for several *months*.

Furthermore, though a 1.131 declaration demonstrating diligence must be provided for *each* named inventor, *see* MPEP § 715.04(I)(A), Applicants submitted declarations only from Vieth, one of the *seven* named inventors of the '714 patent. The lack of required declarations from the six others was not explained. *See* MPEP § 715.04(I). Finally, the date-redacted exhibits to Applicants' submissions (*See, e.g.,* Ex. 1012) were not acceptable, as Applicants were using those submissions as purported evidence of diligence and actual reduction to practice. See MPEP 715.07(II) ("[T]he actual dates of acts relied on to establish diligence

<sup>&</sup>lt;sup>1</sup> Though Vieth's declaration in U.S. Patent Appl. No. 10/761,382 purports to include, in Exhibit A thereto, "partially redacted meeting minutes" from those meetings, Exhibit A is not included in that application's file wrapper.

must be provided.").

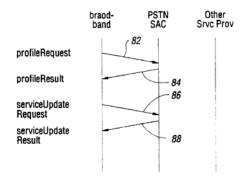
For at least the reasons above, Applicants are unlikely to successfully swear behind the prior art references cited by Petitioner, because Applicants will be unable to demonstrate prior conception coupled with diligence in reducing the claims of the '714 patent to practice.

## E. Summary of Prior Art References Relied Upon

Petitioner relies upon the following prior art references, for which full citations are provided in the Table of Exhibits above:

### 1. Blumhardt

Blumhardt (Ex. 1003) discloses a method of managing subscriber profile data identical to the one claimed in the '714 patent. Figures 1 and 7 of Blumhardt show that profile data is viewed and updated by receiving a profile request message (82) from a client (16); retrieving the subscriber profile data from the public switched telephone network (12); forwarding a profile result message (84) to the client (16); receiving a service update request message (86) from the client (16); and forwarding updated subscriber profile data to the network (12).



#### 2. Buhrmann

Buhrmann (Ex. 1004) discloses a "personal information manager (PIM)" that generates user profile update data based on "profile requests entered by the subscriber." (See Ex. 1004, Abstract.) Just as in the '714 patent, Buhrmann's PIM (122) "transmits the profile update data to a database in a telecommunications system which stores subscriber profile data." (Id.) User access is provided by a "user interface 136, with a display 500 (FIG. 5)." (Id., 8:4-9, FIGS. 1, 4-6.)

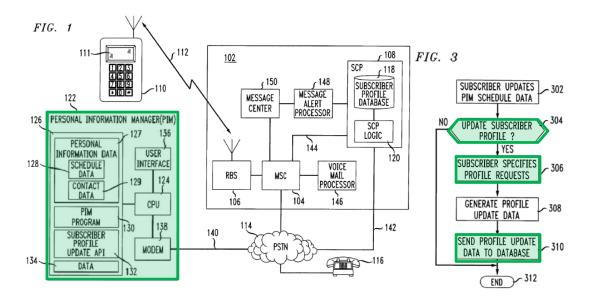


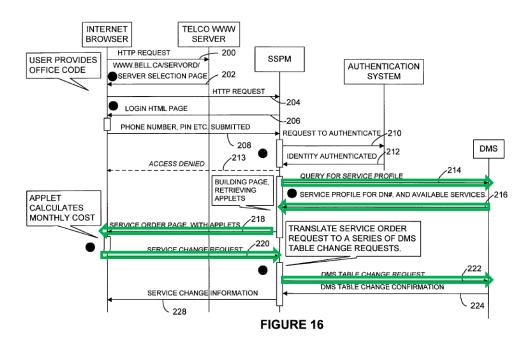
Figure 3 of *Buhrmann* outlines the steps of generating profile update data for use in updating the subscriber profile database. Just as in the '714 patent, a subscriber's profile data is retrieved and forwarded to the subscriber upon request. The request is received (steps 304, 306) by the PIM, which then forwards the update to the database on the communications network (step 310).

### 3. An

An (Ex. 1005) discloses a method for allowing telephone subscribers to use

the Internet to update telephone features. (Ex. 1005, Abstract.) A profile repository connected to the Internet determines which features are active on each subscriber line. (*Id.*) Subscribers may access a special home page, and access and modify their feature profile, eliminating the need for a human operator. (*Id.*)

As shown in Fig. 16 of *An*, profile data is viewed and updated by receiving a query for a service profile (step 214) from a client; retrieving the service profile (step 216) from the network; forwarding a service profile page (step 218) to the client; receiving a service change request (step 220) from the client; and forwarding a table change request (step 222) to the network.



The *An Provisional* Application, to which *An* claims priority, fully supports and explicitly describes *An*'s disclosure of the features claimed by the '714 patent, as shown at least in Table C, below. (Ex. 1005; Ex. 1014, ¶ 101; see *In re Giacomini*, 612 F.3d 1380, 1385, 95 USPQ 2d 1698 (Fed. Cir. 2010) (noting that

35 U.S.C. § 102(e) requires "treating the disclosure of a U.S. patent as prior art as of the filing date of the earliest U.S. application to which the patent is entitled, provided the disclosure was contained in substance in the said earliest application").)

### 4. Elliott

Elliott (Ex. 1007) discloses a comprehensive system for handling "telephone calls, data, and other multimedia information [in] a hybrid network which includes transfer of information across the internet." (Ex. 1007, Abstract.) In particular, Elliott discloses utilizing "user profile information" throughout the system to specify, enable, and control numerous system functions. (*Id.*) Users can manage and control network activities from a user terminal by accessing and updating their "user profile information." (*Id.*) Figure 40 of Elliott illustrates the relationship between the user client (452), the web server (450), and the user profile information database (456).

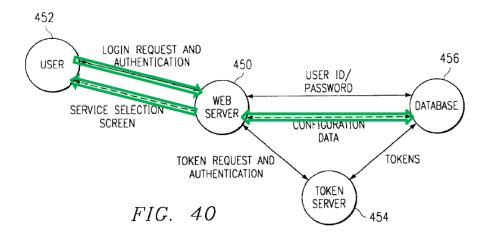


Figure 40 of *Elliott* also highlights the communication paths utilized to receive, from the client, subscriber requests for profile data; retrieve profile data from the network database via the web server; forward the profile data to the user; receive a request to update profile data; and forward an update to the network database via the web server.

### 5. Boulware

Boulware (Ex. 1008) discloses the use of access codes in a call screening system for a telephone switching network. In *Boulware*, a subscriber sets a "privileged caller code" which "allows a subscriber caller who has been provided with the code to be routed directly to the subscriber's telephone upon entering the code when the call screening service is active." (Ex. 1008, 4:5-19, FIG. 1.) The "privileged caller code" is stored as part of the subscriber's profile data (e.g., "call screening service configuration information may reside on any one of a number of service control points (SCP).") (Ex. 1008, 5:5-20.)

### 6. Bayless

Bayless (Ex. 1009) discloses a "call logging feature" as one of several telephone functions in a telecommunications system (10) to be accessed through client computer system (14). (Ex. 1009, Abstract, 60:35-41, FIG. 111.) A graphical user interface (116) allows the user to access databases containing information related to phone calls and callers, such as "time stamps of when the

call began, whether the call went to voicemail, also time duration of the voicemail message, the parties to the call, etc." (*Id.*, Abstract, 60:35-41, 52-55, 60-63.)

### 7. Beck

Beck (Ex. 1010) discloses a profile management system topology in a telecommunications system for "interfacing a service activation controller and a service management system allow[ing] a remote system to generate, update and delete call processing records." (See Ex. 1010, Abstract, 1:34-40.) Beck includes an intermediate network for generating and updating call processing records, which operates "together with [a] service management system/SPACE 250." (Id., 4:25-34, FIGS. 2-3.) SPACE is a service management system by Bellcore, or "Service Provisioning and Creation Environment (SPACE®) system." (Id., 1:55-57, 4:16-18, 27-33, FIGS. 2-3; Ex. 1014, ¶ 57.)

FIG. 3 310 ISCP AIN TRIGGER PROVISIONING SSP FUNCTIONS CCS NETWORK SERVICE ORDER ISCP SERVICE ACTIVA-TION CONTROLLER (SAC) TCP/IP SOP TCP/IP TCP/IP 335 INTERMEDIATE NETWORK 342 TCP/IP SERVICE ACTIVA-TION CONTROLLER (SAC) WORK STATION SPACE MOC TCP/IP 210 SPACE SYSTEM 250

### V. LEVEL OF ORDINARY SKILL IN THE ART

In light of the specification, the references of record, and other available evidence, a person of ordinary skill in the relevant field at the alleged time of invention of the '714 patent would have an undergraduate degree in computer science or electrical engineering and three to four years of experience in the field, or an equivalent combination of education and experience. (*See* Ex. 1014, ¶ 31.)

### VI. CLAIMS 1-22 OF THE '714 PATENT ARE UNPATENTABLE

A detailed explanation of the relevance and manner of applying the prior art references to Claims 1-22 of the '714 patent is provided below.

A. Claims 1-5, 7, 13-15, 17, and 22 are Anticipated by *Blumhardt*, claims 8-9 and 18-19 are rendered obvious by *Blumhardt* in view of *Boulware*, claim 10 is rendered obvious by *Blumhardt* in view of *Bayless*, and claims 14-15 and 21-22 are rendered obvious by *Blumhardt* in view of *Beck*.

Blumhardt discloses each element of claims 1-5, 7, 13-15, 17, and 22.

Blumhardt in view of Boulware renders obvious claims 8-9 and 18-19. There is motivation to combine Blumhardt and Boulware. Blumhardt discloses a "system and method for purchasing, customizing and modifying switch-based and Advanced Intelligent Network (AIN) telephone services through the Broadband Network." (See Ex. 1003, Abstract; Ex. 1014, ¶ 65.) Through the use of a graphical user interface (GUI), Blumhardt's system anticipates that "service subscribers have the capability to create, configure and modify services and they are provided immediate access." (See Ex. 1003, 8:6-8.) Examples of such services

"include, but of course, are not limited to, call-waiting 60, three-way calling 62, and calling name delivery 64, all of which may be found under a broad heading entitled "Select the Features Desired." (*Id.*, 8:28-29, 40-57.)

Boulware discloses "a call screening service ... for a telephone switching network." (Ex. 1008, Abstract; Ex. 1014,  $\P$  66.) Specifically, Boulware provides a "privileged caller code" stored as part of the subscriber's profile data, for example, at "any one of a number of service control points (SCP)." (See Ex. 1008, 5:5-20.) Because Blumhardt provides a system designed to modify a variety of telephone services, a skilled artisan would be readily motivated to incorporate the telephone screening service of Boulware with the known system of Blumhardt to yield a predictable improvement of available services. (See Ex. 1014,  $\P$  67; MPEP §§ 2143, 2144.)

motivation to combine *Blumhardt* and *Bayless*. *Bayless* discloses a telecommunications system providing a variety of telephone features accessed through a graphical user interface at a client computer system. (Ex. 1009, Abstract; Ex. 1014, ¶ 71.) One of the several telephone system features provided by *Bayless* is a "call logging feature," designed to log information about each call generated or received by a user and store that information in a call log database. (*See* Ex. 1009, 60:35-65.) Because *Blumhardt* provides a system designed to create and modify a variety of telephone services (see above), a skilled artisan

would be readily motivated to incorporate the known telephone call logging feature of *Bayless* with the known system of *Blumhardt* to yield a predictable improvement of available services. (*See* Ex. 1014, ¶ 72; MPEP §§ 2143, 2144.)

and 21-22. There is also motivation to combine *Blumhardt* and *Beck*. *Blumhardt* provides a system "specifically adapted for use in purchasing and customizing switch-based services as well as purchasing, customizing and modifying Advanced Intelligent Network (AIN) telephone services." (Ex. 1003, 3:28-37; Ex. 1014, ¶ 75.) *Blumhardt's* system architecture "includes a Service Switching Point (SSP) and an AIN Service Control Point (SCP) ... provided in electrical communication with the SSP and the PSTN service activation and control functionality." (*See* Ex. 1003, 3:28-37.) "The SCP is operative to provide an AIN service template for each of the PSTN service subscribers." (*Id.*)

Similarly, *Beck* discloses a profile management system topology in a telecommunications system for "interfacing a service activation controller and a service management system allow[ing] a remote system to generate, update and delete call processing records." (*See* Ex. 1010, Abstract, 1:34-40; Ex. 1014, ¶ 76.) *Beck's* system includes an intermediate network for generating and updating call processing records, which operates "together with [a] service management system/SPACE 250." (*Id.*, 4:25-34; FIGS. 2-3.) The SPACE service management system provides a "maintenance operating console 344 to monitor the status of the

[Integrated] SCPs." Because *Blumhardt* and *Beck* have similar system architectures and are both designed to perform user service management, a skilled artisan would be readily motivated to incorporate the known intermediate SPACE system of *Beck* with the known system of *Blumhardt* to yield a predictable improvement of the service management system. (*See* Ex. 1014, ¶ 77; MPEP §§ 2143, 2144.)

Table A: Proposed Rejections A(1), USPN 5,629,978 to *Blumhardt*; A(2), *Blumhardt* in view of USPN 5,757,899 to *Boulware*; A(3), *Blumhardt* in view of USPN 5,754,636 to *Bayless*; and A(4), *Blumhardt* in view of USPN 5,883,946 to *Beck* 

Claim Element	A(1), A(2), A(3), A(4)
[1a.] A method for	
managing, by a profile	
management system,	
subscriber profile data	
associated with a	
communications service	
subscribed to by a	
subscriber, the subscriber	
profile data being stored	
on a communications	
network which executes	
the communications	
service in accordance with	
the subscriber profile data,	
the method comprising:	
[1b.] receiving a	Blumhardt discloses receiving a subscriber request
subscriber request to view	"via a profile request message 82" from a client (e.g.,
the subscriber profile data	"Customer Premises Equipment (CPE) 16", including
from a client which hosts	"Set Top Terminal 26" and "Television 28") when the
a user interface configured	"subscriber desires to modify or view" the subscriber
to allow the subscriber to	profile data (e.g., "telephone services"). The client
view and update the	hosts a user interface (e.g., the "Graphical User
subscriber profile data;	Interface" provided on "Television 28," as illustrated

Claim Element	A(1), A(2), A(3), A(4)
	by FIGS 3-6) configured to allow the subscriber to
	view and update the subscriber profile data (e.g., "In
	operation subscribers have the capability to create,
	configure and modify services.") (See, e.g., Ex. 1003,
	7:52-56, 8:6-13, 32-36, 10:23-27, FIGS. 1, 3-7; Ex.
	1014, ¶ 60.)
[1c.] retrieving the	Blumhardt discloses retrieving the subscriber profile
subscriber profile data	data from the communications network (e.g., "The
from the communications	service activation and control
network based upon	portion 18 of the PSTN 12 will respond with a profile
receiving the subscriber	result message 84") upon receiving the subscriber
request to view the	request "via profile request message 82" from the
subscriber profile data	client (e.g., "CPE 16"). (See, e.g., Ex. 1003, 10:27-
from the client;	30, FIG. 7; Ex. 1014, ¶ 61.)
[1d.] forwarding the	Blumhardt discloses forwarding the subscriber profile
subscriber profile data to	data (e.g., "profile result message 84") to the client
the client;	(e.g., "and the broadband network 14 will then
	display the information to the user over television
	28.") (See, e.g., Ex. 1003, 10:24-30, FIG. 7; Ex.
	1014, ¶ 61.)
[1e.] receiving a	Blumhardt discloses receiving a subscriber request to
subscriber request to	update subscriber profile data from the client (e.g.,
update the subscriber	subscriber updates telephone services via the
profile data from the	"Graphical User Interface" provided on "Television
client, and	28," as illustrated by FIGS 3-6, and "[w]hen the
	subscriber wishes to activate any changes made to
	their telephone services, the broadband network 14
	will send a service update request message 86 to the
	service activation control portion 18 of the PSTN
	12.") (See, e.g., Ex. 1003, 10:29-30, FIGS. 3-7; Ex.
	1014, ¶ 62.)
[1f.] forwarding an update	Blumhardt discloses forwarding an update (e.g.,
for the subscriber profile	"service update request message 86") for the
data to the	subscriber profiles data (e.g., "telephone services") to
communications network	the communications network. "When the subscriber
based upon receiving the	wishes to activate any changes made to their
subscriber request to	telephone services, the broadband network 14 will
update the subscriber	send a service update request message 86 to the
profile data from the	service activation control portion 18 of the PSTN 12.
client.	The data will then be loaded into the appropriate

Claim Element	A(1), A(2), A(3), A(4)
	network elements and operations systems for service, and a service update result message 88 will be returned to the broadband application." ( <i>See</i> , <i>e.g.</i> , Ex. 1003, 10:29-37, FIGS. 3-7; Ex. 1014, ¶ 62.)
[2.] The method for managing subscriber profile data of claim 1, wherein the subscriber profile data is retrieved from the communications network via at least one intermediate system.	Blumhardt discloses that subscriber profile data is retrieved from the communications network (e.g., "PSTN 12") via at least one intermediate system (e.g., "broadband network 14"). In FIG. 1, PSTN 12 "is shown directly interfaced with the Broadband network 14." Further, "[t]he Broadband Network 14 is provided in electrical communication with CPE 16 and, more specifically, STT 26, which is connected to a Graphical User Interface (GUI) such as television 28." (See, e.g., Ex. 1003, 4:64-5:8, 10:27-34, FIGS. 1, 7; Ex. 1014, ¶ 63.)
[3.] The method for managing subscriber profile data of claim 1, wherein the update for the subscriber profile data is forwarded to the communications network via at least one intermediate system.	Blumhardt discloses that the update for the subscriber profile data is forwarded to the communications network (e.g., "PSTN 12") via at least one intermediate system (e.g., "broadband network 14"). In FIG. 1, PSTN 12 "is shown directly interfaced with the Broadband network 14." Further, "[t]he Broadband Network 14 is provided in electrical communication with CPE 16 and, more specifically, STT 26, which is connected to a Graphical User Interface (GUI) such as television 28." (See, e.g., Ex. 1003, 4:64-5:8, 10:27-34, FIGS. 1, 7.)
[4.] The method for managing subscriber profile data of claim 1, wherein the profile management system comprises a server.	Blumhardt discloses that the profile management system comprises a server, "service activation control portion 18," which "is operative to perform the basic tasks of service delivery, i.e., the provision and modification of telephone services; and service assurance, i.e. maintenance of the telephone system. This service activation and control functionality takes the form of complex hardware and software." (See, e.g., id., 4:43-54, FIG. 1; Ex. 1014, ¶ 63.)
[5.] The method for managing subscriber profile data of claim 1, wherein the user interface	Blumhardt discloses that the user interface is a "Graphical User Interface" provided on "Television 28," as illustrated by FIGS 3-6. (See, e.g., Ex. 1003, 2:63-65, 3:13-24, 8:32-36, FIGS. 3-6.)

Claim Element	A(1), A(2), A(3), A(4)
is a graphical user	
interface.	
[7.] The method for managing subscriber profile data of claim 6, wherein the communications network comprises a telecommunications network.	Blumhardt discloses that the communications network comprises a telecommunications network (e.g., "PSTN 12"). FIG. 1 illustrates that the "system of the present invention may be viewed as including the Public Switched Telephone Network (PSTN) designated generally by reference numeral 12." (See, e.g., id., 2:52-57, 4:34-63, FIG. 1.)
[8.] The method for managing subscriber profile data of claim 7, wherein the subscriber profile data comprises	Blumhardt discloses that the subscriber profile data comprises authorized telephone numbers (e.g., "reject these calls" feature). (See, e.g., id., 9:38-41, FIGS. 4-6.)
access codes and authorized telephone numbers.	Boulware discloses access codes (e.g., "privileged caller codes") stored in "subscriber databases distributed throughout the telephony network for describing subscriber configurations of network services." For example, "the call screening service configuration information may reside on any one of a number of service control points (SCP)." (See, e.g., Ex. 1008, 4:5-19, 5:5-24, FIG. 1.)
[9.] The method for managing subscriber profile data of claim 8, wherein, when a calling party calls the subscriber	Blumhardt discloses that the subscriber profile data comprises authorized telephone numbers (e.g., "reject these calls" feature). (See, e.g., Ex. 1003, 9:38-41, FIGS. 4-6.)
party calls the subscriber, the calling party is only successfully connected to the subscriber when either the calling party's telephone number is an authorized telephone number or when the calling party inputs one of the access codes.	Boulware discloses that, when a calling party (e.g., "subscriber caller") enters the "privileged caller code" when the call screening service is active, the caller will be routed directly to the subscriber's telephone. "Thus the subscriber may provide this code to potential callers so that these callers may circumvent having their calls screened when calling the subscriber, as illustrated by the flow path from step 36 to step 28 [of FIG. 1]." (See, e.g., Ex. 1008, 4:5-19, 5:5-24, FIG. 1.)
[10.] The method for managing subscriber	Bayless discloses a reporting system that generates reports (e.g., "a call log database") containing

Claim Element	A(1), A(2), A(3), A(4)
profile data of claim 9,	information about calling parties attempting to
wherein a reporting	connect to the subscriber (e.g., "each call generated or
system generates reports	received by a user.") The call log database may
comprising calling parties	include information such as time stamps of when a
attempting to connect to	call began and parties to the call (calling parties
the subscriber, indicating	successfully connected to the subscriber), as well as
each calling party	whether a call went to voicemail and the time
successfully connected to	duration of a voicemail message (calling parties not
the subscriber and each	successfully connected to the subscriber). (See, e.g.,
calling party not	Ex. 1009, 60:35-41, 52-55, 60-63, 61:4-15, FIG. 111.)
successfully connected to	
the subscriber.	
[13a.] A method for	Blumhardt discloses this element. See Table A,
managing subscriber	Element [1a], above.
profile data associated	
with a communications	
service subscribed to by a	
subscriber, the subscriber	
profile data being stored	
on a communications	
network which executes	
the communications	
service in accordance with	
the subscriber profile data,	
the method comprising:	
[13b.] receiving, from a	Blumhardt discloses this element. See Table A,
profile management	Element [1b], above.
system, a subscriber	
request to view the	
subscriber profile data, the	
subscriber request to view	
the subscriber profile data	
being received from the	
profile management	
system based upon the	
profile management	
system receiving the	
subscriber request to view	
the subscriber profile data from a client which hosts	
nom a chefit which hosts	

Claim Element	A(1), A(2), A(3), A(4)
a user interface configured	
to allow the subscriber to	
view and update the	
subscriber profile data;	
[13c.] forwarding the	Blumhardt discloses this element. See Table A,
subscriber profile data to	Elements [1c] and [1d], above.
the profile management	
system based upon	
receiving the subscriber	
request to view the	
subscriber profile data	
from the profile	
management system, the	
profile management	
system being configured	
to forward the subscriber	
profile data to the client	
when the profile	
management system	
receives the subscriber	
profile data;	
[13d.] receiving an update	Blumhardt discloses this element. See Table A,
for the subscriber profile	Elements [1e] and [1f], above.
data from the profile	
management system, the	
update for the subscriber	
profile data being received	
from the profile	
management system based	
upon the profile	
management system	
receiving a subscriber	
request to update the	
subscriber profile data	
from the client, wherein	
the communications	
network executes the	
communications service in	
accordance with the	
updated subscriber profile	

Claim Element	A(1), A(2), A(3), A(4)
data.	(-/)(-/)(-/)
[14.] The method for managing subscriber profile data of claim 13, wherein the subscriber profile data is forwarded to the profile management system via at least one intermediate system.	Blumhardt discloses that subscriber profile data is retrieved from the communications network (e.g., "PSTN 12") via at least one intermediate system (e.g., "broadband network 14"). In FIG. 1, PSTN 12 "is shown directly interfaced with the Broadband network 14." Further, "[t]he Broadband Network 14 is provided in electrical communication with CPE 16 and, more specifically, STT 26, which is connected to a Graphical User Interface (GUI) such as television 28." (See, e.g., Ex. 1003, 4:64-5:8, 10:27-34, FIGS. 1, 7; Ex. 1014, ¶ 63.)
	Beck further discloses this profile management system topology (e.g., FIGS. 2 and 3). "One of the SACs 210 processes the order and sends a provisioning message to an intermediate network 335 in system 310. The intermediate network 335 includes communications agent 220, queue 230, memory 280, and SPI 240 shown in FIG. 2". Forwarding to the profile management system via at least on intermediate system occurs when "one of the SACs 210 receive a message from intermediate network 335" (See, e.g., Ex. 1010, 4:27-31, 47-48, FIGS 2-3.)
[15.] The method for managing subscriber profile data of claim 13, wherein the update for the subscriber profile data is received from the profile management system via at least one intermediate system.	Blumhardt discloses this element. See Table A, Element [14], above.  Beck discloses this element. See Table A, Element [14], above.
[17.] The method for managing subscriber profile data of claim 16, wherein the communications network comprises a	Blumhardt discloses that the communications network comprises a telecommunications network (e.g., "PSTN 12"). FIG. 1 illustrates that the "system of the present invention may be viewed as including the Public Switched Telephone Network (PSTN) designated generally by reference numeral

Claim Element	A(1), A(2), A(3), A(4)
telecommunications	12." (See, e.g., Ex. 1003, 2:52-57, 4:34-63, FIG. 1.)
network.	
[18.] The method for	Blumhardt discloses that the subscriber profile data
managing subscriber	comprises authorized telephone numbers (e.g., "reject
profile data of claim 17,	these calls" feature). (See, e.g., id., 9:38-41, FIGS. 4-
wherein the subscriber	6.)
profile data comprises	
access codes and	Boulware discloses access codes (e.g., "privileged
authorized telephone	caller codes") stored in "subscriber databases
numbers.	distributed throughout the telephony network for
	describing subscriber configurations of network services." For example, "the call screening service
	configuration information may reside on any one of a
	number of service control points (SCP)." (See, e.g.,
	Ex. 1008, 4:5-19, 5:5-24, FIG. 1.)
[19.] The method for	Blumhardt discloses that the subscriber profile data
managing subscriber	comprises authorized telephone numbers (e.g., "reject
profile data of claim 18,	these calls" feature). (See, e.g., Ex. 1003, 9:38-41,
wherein, when a calling	FIGS. 4-6.)
party calls the subscriber,	
the calling party is only	Boulware discloses that, when a calling party (e.g.,
successfully connected to	"subscriber caller") enters the "privileged caller code"
the subscriber when either	when the call screening service is active, the caller
the calling party's	will be routed directly to the subscriber's telephone.
telephone number is one	"Thus the subscriber may provide this code to
of the authorized	potential callers so that these callers may circumvent
telephone numbers or the	having their calls screened when calling the subscriber, as illustrated by the flow path from step
calling party inputs one of the access codes.	36 to step 28 [of FIG. 1]." (See, e.g., Ex. 1008, 4:5-
the access codes.	19, 5:5-24, FIG. 1.)
[21.] The method for	Beck further that the "intermediate network 335"
managing subscriber	further comprises "service management
profile data of claim 14,	system/SPACE 250." SPACE is a service
wherein the intermediate	management system by Bellcore, or "Service
system further comprises	Provisioning and Creation Environment (SPACE®)
SPACE.	system." (See, e.g., Ex. 1010, 1:55-57, 4:16-18, 27-
	33, FIGS 2-3.)
[22.] The method for	Blumhardt discloses that the profile management
managing subscriber	system communicates with the client using TCP/IP:
profile data of claim 13,	"SCP 36 is further provided in electrical

Claim Element	A(1), A(2), A(3), A(4)
wherein the profile	communication with PSTN service activation and
management system	control functionality 18 through signalling link 42
communicates with the	which may comprise ROSE TCP/IP or any other
client using TCP/IP.	suitable signalling protocol." (See, e.g., Ex. 1003,
	5:49-53.)
	Beck also discloses that "[c]ommunication between
	SAC 210 and communications agent 220 preferably
	uses a transmission control protocol/internet protocol
	(TCP/IP). TCP/IP is an internet standard for packet
	switching between computing systems." (See, e.g.,
	Ex. 1010, 4:53-64.)

B. Claims 1-7, 12-17, and 20 are Anticipated by *Buhrmann*, claims 8-9 and 18-19 are rendered obvious by *Buhrmann* in view of *Boulware*, claim 10 is rendered obvious by *Buhrmann* in view of *Bayless*, and claims 14-15 and 21-22 are rendered obvious by *Buhrmann* in view of *Beck*.

Buhrmann discloses each element of claims 1-7, 12-17, and 20. Buhrmann in view of Boulware renders obvious each element of claims 8-9 and 18-19. There is motivation to combine Buhrmann and Boulware. Buhrmann discloses a personal information manager (PIM) that, "based on additional profile requests entered by the subscriber, generates profile update data associated with the personal information data." (Ex. 1004, Abstract; Ex. 1014, ¶ 84.) "The PIM transmits the profile update data to a database in a telecommunication system which stores subscriber profile data." (Ex. 1004, Abstract.) Buhrmann provides that "telecommunication services, including call completion services and message reminder services, are provided to the subscriber based on the updated subscriber profile data." (Id.) The subscriber profile record of a subscriber is updated in a

database via PIM while the PIM can be in any type of electronic personal information device (*Id.*, 6:36-42.) *Buhrmann* acknowledges that "telecommunications service providers are offering many different types of telecommunication services to their customers," with examples including "call completion," "call forwarding," and "alert reminder" services. (*Id.*, 1:20-67.)

As described above, *Boulware* discloses a "privileged caller code," which is stored as part of a subscriber's profile data. (Ex. 1008, 5:5-20; Ex. 1014,  $\P$  85.) The SCP that *Boulware* uses for call screening is the same SCP that *Buhrmann* refers to as a subscriber profile database in the PSTN. (Ex. 1014,  $\P$  85.) Because *Buhrmann* provides a system designed to modify telephone services, a skilled artisan would be readily motivated to incorporate the known telephone screening service of *Boulware* with the known system of *Buhrmann* to yield a predictable improvement of available services. (*See, e.g., id.*,  $\P$  86; MPEP §§ 2143, 2144.)

Buhrmann in view of Bayless renders obvious each element of claim 10. There is also motivation to combine Buhrmann and Bayless. As described above, Bayless discloses a graphical user interface for updating telephone system features, including a "call logging feature." (Ex. 1009, 60:35-65; Ex. 1014,  $\P$  90.) Because Buhrmann provides a system designed to modify a variety of telephone services, a skilled artisan would be readily motivated to incorporate the known telephone call logging feature of Bayless with the known system of Buhrmann to yield a

predictable improvement of available services. (See Ex. 1014, ¶ 91; MPEP §§ 2143, 2144.)

Buhrmann in view of Beck renders obvious claims 14-15 and 21-22. There is also motivation to combine Buhrmann and Beck. Buhrmann provides a system "for updating a telecommunication subscriber profile and for providing telecommunication services based on the updated subscriber profile." (Ex. 1004, 5:13-15; Ex. 1014, ¶ 94.) It includes a "mobile switching center (MSC)" connected to both the public switched telephone network (PSTN), service control point (SCP) 108, the voice mail processor 146, and the message center 150. (Ex. 1004, 5:52-57.) The SCP "contains a database 118 which contains subscriber profiles." (Id., 5:58-59.)

As described above, Beck discloses a profile management system topology that operates "together with [a] service management system/SPACE 250." (Ex. 1010, 4:25-34, FIGS. 2-3; Ex. 1014, ¶ 95.) Because Buhrmann and Beck have similar system architectures and are designed to perform user service management, a skilled artisan would be readily motivated to incorporate the known intermediate SPACE service management system of Beck with the known system of Buhrmann to yield a predictable improvement of the service management system. (See Ex. 1014, ¶ 96; MPEP §§ 2143, 2144.)

Table B: Proposed Rejections B(1), USPN 5,903,845 to *Buhrmann*; B(2), *Buhrmann* in view of USPN 5,757,899 to *Boulware*; B(3), *Buhrmann* in view of USPN 5,754,636 to *Bayless*; and B(4), *Buhrmann* in view of USPN 5,883,946 to *Beck* 

Claim Element	B(1), B(2), B(3), B(4)
[1a.] A method for managing,	
by a profile management	
system, subscriber profile data	
associated with a	
communications service	
subscribed to by a subscriber,	
the subscriber profile data	
being stored on a	
communications network	
which executes the	
communications service in	
accordance with the subscriber	
profile data, the method	
comprising:	
[1b.] receiving a subscriber	Buhrmann discloses receiving a subscriber
request to view the subscriber	request (e.g., via "profile request field 502")
profile data from a client which	from a client (e.g., personal information
hosts a user interface	manager (PIM) 122") to view the subscriber
configured to allow the	profile data (e.g., "schedule data" provided via
subscriber to view and update	the schedule display of FIG. 5). The client,
the subscriber profile data;	"PIM 122," includes a CPU 124, a memory 126,
	and a modem 138, and hosts a user interface
	(e.g., "user interface 136") configured to allow
	the subscriber to view and update the subscriber
	profile data (e.g., "the subscriber is provided
	with a schedule display for a chosen day via the
	user interface 136" and may "generat[e] profile
	update data, based on schedule data, for use in
	updating the subscriber profile database 118.")
	(See, e.g., Ex. 1004, 6:37-53, 7:13-39, 8:4-14,
	FIGS. 1, 3-5; Ex. 1014, ¶ 80.)
[1c.] retrieving the subscriber	Buhrmann discloses retrieving the subscriber
profile data from the	profile data from the communications network
communications network based	(e.g., "modem 138" of "PIM 122" retrieves
upon receiving the subscriber	information from "service control point (SCP)

Claim Element	B(1), B(2), B(3), B(4)
request to view the subscriber	108 through the PSTN 114") upon receiving the
profile data from the client;	subscriber request from the client (e.g., "PIM
	122"). (See, e.g., Ex. 1004, 7:13-22, FIG. 1; Ex.
	1014. ¶ 80.)
[1d.] forwarding the subscriber	Buhrmann discloses forwarding the subscriber
profile data to the client;	profile data to the client (e.g., "the subscriber
	is provided with a schedule display for a chosen
	day via the user interface 136. An example
	schedule display 400 is shown in FIG. 4.") (See,
	e.g., Ex. 1004, 3:54-4:4, 7:36-39, FIGS. 4-5; Ex.
	1014. ¶ 80.)
[1e.] receiving a subscriber	Buhrmann discloses receiving a subscriber
request to update the subscriber	request to update subscriber profile data from the
profile data from the client, and	client (e.g., "upon entry of schedule data 128 by
	the subscriber in step 302, the subscriber is
	queried by the PIM 122 as to whether the
	subscriber would like to update his/her
	telecommunication subscriber profile based on
	the PIM entries (step 304) If the subscriber
	answers "YES" to this query, then in step 306
	the subscriber enters profile requests into the
	PIM 122.") (See, e.g., Ex. 1004, 3:54-4:4, 7:55-
[1f] forwarding an undata for	65, FIGS. 3-5; Ex. 1014. ¶ 81, 82.)
[1f.] forwarding an update for the subscriber profile data to	Buhrmann discloses forwarding an update for the subscriber profiles data to the communications
the communications network	network. "PIM 122 transmits the profile update
based upon receiving the	data in step 310," which is denoted "send
subscriber request to update the	profile update data to database" in FIG. 3. "The
subscriber request to apathe the subscriber profile data from the	profile update data is transmitted to the SCP
client.	108 via modem 138 [and] PSTN 114" (See, e.g.,
onone.	Ex. 1004, 3:54-4:4, 9:14-18, FIG. 3; Ex. 1014, ¶¶
	81, 82.)
[2.] The method for managing	Buhrmann discloses that "modem 138" of "PIM
subscriber profile data of claim	122" retrieves information from "service control
1, wherein the subscriber	point (SCP) 108 through the PSTN 114." (See
profile data is retrieved from	Ex. 1004, 7:13-22; FIG. 1.) The telephone
the communications network	network itself, as well as the PSTN Service
via at least one intermediate	Activation Control (SAC), act as intermediate
system.	systems. FIG. 7 of <i>Blumhardt</i> illustrates the
	exchange of messages between a broadband

Claim Element	B(1), B(2), B(3), B(4)
	network and a PSTN service provider when the
	telephone service subscriber modifies or views
	their telephone services, while the activation and
	control portion of the PSTN, as an intermediator
	responds with a profile result message. (See, e.g.,
	Ex. 1004, 10:20-27, FIG. 7; Ex. 1014, ¶¶ 81, 82.)
[3.] The method for managing	Buhrmann discloses that "modem 138" of "PIM
subscriber profile data of claim	122" forwards update information to "service
1, wherein the update for the	control point (SCP) 108 through the PSTN 114."
subscriber profile data is	(See, e.g., Ex. 1004, 7:13-22, FIG. 1.) The
forwarded to the	telephone network itself, as well as the PSTN
communications network via at	Service Activation Control (SAC), act as
least one intermediate system.	intermediate systems. FIG. 7 of <i>Blumhardt</i>
	illustrates the exchange of messages between a
	broadband network and a PSTN service provider
	when the telephone service subscriber modifies
	or views their telephone services, while the
	control portion of the PSTN, as an intermediator
	responds with a profile result message. (See, e.g.,
	Ex. 1004, 10:20-27, FIG. 7; Ex. 1014, ¶¶ 81, 82.)
[4.] The method for managing	Buhrmann discloses that the profile management
subscriber profile data of claim	system comprises a server (e.g., "Personal
1, wherein the profile	Information Manager (PIM) 122"). "As shown
management system comprises	in FIG. 1, a suitable PIM 122 includes a central
a server.	processing unit (CPU) 124 connected to a
	memory 126, a user interface 136, and a modem
	138. The memory 126 contains storage areas for
	storing personal information data 127, a PIM
	program 130, a subscriber profile update
	application program interface (API) 132." (See,
	<i>e.g.</i> , Ex. 1004, 6:37-53, FIG. 1.)
[5.] The method for managing	Buhrmann discloses that "user interface 136 may
subscriber profile data of claim	be a display monitor" and that "the subscriber
1, wherein the user interface is	is presented, through the user interface 136, with
a graphical user interface.	a display 500 (FIG. 5)." FIGS. 4-6 illustrate
	example graphical user interface displays. (See,
	e.g., id., 7:13-21, 8:4-9, FIGS. 1, 4-6.)
[6.] The method for managing	<i>Buhrmann</i> discloses that the communications
subscriber profile data of claim	service includes positive identification (e.g.,
1, wherein the communications	"selective call acceptance.") For example,

Claim Element	B(1), B(2), B(3), B(4)
service comprises positive	"[e]ntry 506 is a call completion request
identification.	indicating that the subscriber requests
	selective call acceptance such that only calls
	from the telephone number (123) 555-6666 will
	be delivered all other calls will be forwarded
	to subscriber's voice mail." ( <i>See, e.g., id.</i> , 8:20-26, FIGS. 5, 11.)
[7.] The method for managing	Buhrmann discloses that the communications
subscriber profile data of claim	network comprises a telecommunications
6, wherein the communications	network (e.g., "PSTN 114"). (See Ex. 1004,
network comprises a	7:13-22; FIG. 1.) Additionally, "[I]n an alternate
telecommunications network.	embodiment, as shown in FIG. 9, the PIM 122
	sends the profile update data to the wireless cellular communication network 102 via a
	wireless communication link instead of the
	PSTN 114." (See, e.g., id., 12:14-29, FIG. 9.)
[8.] The method for managing	Buhrmann discloses that the subscriber profile
subscriber profile data of claim	data comprises authorized telephone numbers
7, wherein the subscriber	(e.g., "the subscriber requests selective call
profile data comprises access	acceptance such that only calls from the
codes and authorized telephone	telephone number (123) 555-6666 will be
numbers.	delivered." (See, e.g., id., 8:20-26, FIG. 5.)
	Boulware discloses access codes (e.g.,
	"privileged caller codes") stored in "subscriber
	databases distributed throughout the telephony
	network for describing subscriber configurations
	of network services." For example, "the call
	screening service configuration information may
	reside on any one of a number of service control
	points (SCP)." (See, e.g., Ex. 1008, 4:5-19, 5:5-
	24, FIG. 1.)
[9.] The method for managing	Buhrmann discloses that the subscriber profile
subscriber profile data of claim	data comprises authorized telephone numbers
8, wherein, when a calling	(e.g., "the subscriber requests selective call
party calls the subscriber, the	acceptance such that only calls from the
calling party is only successfully connected to the	telephone number (123) 555-6666 will be delivered." (See, e.g., Ex. 1004, 8:20-26, FIG.
subscriber when either the	5.)
calling party's telephone	3.,
carring party 5 telephone	

Claim Element	B(1), B(2), B(3), B(4)
number is an authorized telephone number or when the calling party inputs one of the access codes.	Boulware discloses that, when a calling party (e.g., "subscriber caller") enters the "privileged caller code" when the call screening service is active, the caller will be routed directly to the subscriber's telephone. "Thus the subscriber may provide this code to potential callers so that these callers may circumvent having their calls screened when calling the subscriber, as illustrated by the flow path from step 36 to step 28 [of FIG. 1]." (See, e.g., Ex. 1008, 4:5-19, 5:5-24, FIG. 1.)
[10.] The method for managing subscriber profile data of claim 9, wherein a reporting system generates reports comprising calling parties attempting to connect to the subscriber, indicating each calling party successfully connected to the subscriber and each calling party not successfully connected to the subscriber.	Bayless discloses a reporting system that generates reports (e.g., "a call log database") containing information about calling parties attempting to connect to the subscriber (e.g., "each call generated or received by a user.") The call log database may include information such as time stamps of when a call began and parties to the call (calling parties successfully connected to the subscriber), as well as whether a call went to voicemail and the time duration of a voicemail message (calling parties not successfully connected to the subscriber). (See, e.g., Ex. 1009, 60:35-41, 52-55, 60-63, 61:4-15, FIG. 111.)
[12.] The method for managing subscriber profile data of claim 1, further comprising: receiving, from the client, a time specified by the subscriber as to when the requested update for the subscriber profile data should be forwarded to the communications network.  [13a.] A method for managing subscriber profile data associated with a communications service subscribed to by a subscriber,	Buhrmann discloses that "the PIM 122 could be configured, through the subscriber profile update API 132, to automatically generate profile update data based on the schedule data 128 entered by the subscriber." In this way, the subscriber may store information indicating that whenever an event is scheduled in the schedule data 128 (i.e. "a time specified by the subscriber"), the PIM 122 should automatically generate update data. (See, e.g., Ex. 1004, 8:54-9:13.)  Buhrmann discloses this element. See Table B, Element [1a], above.

Claim Element	B(1), B(2), B(3), B(4)
the subscriber profile data	
being stored on a	
communications network	
which executes the	
communications service in	
accordance with the subscriber	
profile data, the method	
comprising:	
[13b.] receiving, from a profile	Buhrmann discloses this element. See Table B,
management system, a	Element [1b], above.
subscriber request to view the	
subscriber profile data, the	
subscriber request to view the	
subscriber profile data being	
received from the profile	
management system based	
upon the profile management	
system receiving the subscriber	
request to view the subscriber	
profile data from a client which	
hosts a user interface	
configured to allow the	
subscriber to view and update	
the subscriber profile data;	
[13c.] forwarding the	Buhrmann discloses this element. See Table B,
subscriber profile data to the	Elements [1c] and [1d], above.
profile management system	
based upon receiving the	
subscriber request to view the	
subscriber profile data from the	
profile management system,	
the profile management system	
being configured to forward the	
subscriber profile data to the	
client when the profile	
management system receives	
the subscriber profile data;	
[13d.] receiving an update for	Buhrmann discloses this element. See Table B,
the subscriber profile data from	Elements [1e] and [1f], above.
the profile management	

Claim Element	B(1), B(2), B(3), B(4)
System, the update for the subscriber profile data being received from the profile management system based upon the profile management system receiving a subscriber request to update the subscriber profile data from the client, wherein the communications network executes the communications service in accordance with the updated subscriber profile data.  [14.] The method for managing subscriber profile data of claim 13, wherein the subscriber profile data is forwarded to the profile management system via at least one intermediate system.	Buhrmann discloses that "modem 138" of "PIM 122" forwards update information to "service control point (SCP) 108 through the PSTN 114." (See, e.g., Ex. 1004, 7:13-22, FIG. 1.) The telephone network itself, as well as the PSTN Service Activation Control (SAC), act as intermediate systems. FIG. 7 of Blumhardt illustrates the exchange of messages between a broadband network and a PSTN service provider when the telephone service subscriber modifies or views their telephone services, while the activation and control portion of the PSTN, as an intermediator responds with a profile result message. (See, e.g., Ex. 1004, 10:20-27, FIG. 7; Ex. 1014. ¶ 81.)  Beck further discloses this profile management system topology. (See, e.g., Ex. 1010, FIGS. 2 and 3.) "One of the SACs 210 processes the order and conds a provisioning message to an
	Beck further discloses this profile management system topology. (See, e.g., Ex. 1010, FIGS. 2 and 3.) "One of the SACs 210 processes the order and sends a provisioning message to an
	intermediate network 335 in system 310. The intermediate network 335 includes communications agent 220, queue 230, memory 280, and SPI 240 shown in FIG. 2". Forwarding to the profile management system via at least on
	intermediate system occurs when "one of the SACs 210 receive a message from intermediate

Claim Element	B(1), B(2), B(3), B(4)
	network 335" (See, e.g., id., 4:27-31, 47-48, FIGS 2-3.)
[15.] The method for managing subscriber profile data of claim 13, wherein the update for the subscriber profile data is received from the profile management system via at least one intermediate system.	Buhrmann discloses this element. See Table B, Element [14], above.  Beck discloses this element. See Table B, Element [14], above.
[16.] The method for managing subscriber profile data of claim 13, wherein the communications service comprises positive identification.	Buhrmann discloses that the communications service includes positive identification (e.g., "selective call acceptance.") For example, "[e]ntry 506 is a call completion request indicating that the subscriber requests selective call acceptance such that only calls from the telephone number (123) 555-6666 will be delivered all other calls will be forwarded to subscriber's voice mail." (See, e.g., Ex. 1004, 8:20-26, FIG. 5.)
[17.] The method for managing subscriber profile data of claim 16, wherein the communications network comprises a telecommunications network.	Buhrmann discloses that the communications network comprises a telecommunications network (e.g., "PSTN 114"). (See, e.g., Ex. 1004, 7:13-22, FIG. 1.) Additionally, "[I]n an alternate embodiment, as shown in FIG. 9, the PIM 122 sends the profile update data to the wireless cellular communication network 102 via a wireless communication link instead of the PSTN 114." (See, e.g., id., 12:14-29, FIG. 9.)
[18.] The method for managing subscriber profile data of claim 17, wherein the subscriber profile data comprises access codes and authorized telephone numbers.	Buhrmann discloses that the subscriber profile data comprises authorized telephone numbers (e.g., "the subscriber requests selective call acceptance such that only calls from the telephone number (123) 555-6666 will be delivered." (See, e.g., id., 8:20-26, FIG. 5.)
	Boulware discloses access codes (e.g., "privileged caller codes") stored in "subscriber databases distributed throughout the telephony network for describing subscriber configurations of network services." For example, "the call

Claim Element	B(1), B(2), B(3), B(4)
	screening service configuration information may reside on any one of a number of service control points (SCP)." ( <i>See, e.g.,</i> Ex. 1008, 4:5-19, 5:5-24, FIG. 1.)
[19.] The method for managing subscriber profile data of claim 18, wherein, when a calling party calls the subscriber, the calling party is only successfully connected to the subscriber when either the calling party's telephone	Buhrmann discloses that the subscriber profile data comprises authorized telephone numbers (e.g., "the subscriber requests selective call acceptance such that only calls from the telephone number (123) 555-6666 will be delivered." (See, e.g., Ex. 1004, 8:20-26, FIG. 5.)
number is one of the authorized telephone numbers or the calling party inputs one of the access codes.	Boulware discloses that, when a calling party (e.g., "subscriber caller") enters the "privileged caller code" when the call screening service is active, the caller will be routed directly to the subscriber's telephone. "Thus the subscriber may provide this code to potential callers so that these callers may circumvent having their calls screened when calling the subscriber, as illustrated by the flow path from step 36 to step 28 [of FIG. 1]." (See, e.g., Ex. 1008, 4:5-19, 5:5-24, FIG. 1.)
[20.] The method for managing subscriber profile data of claim 14, wherein the intermediate system comprises a service management system (SMS) server.	Buhrmann discloses "Message Center 150," which processes and generates SMS messages. (See, e.g., Ex. 1004, 11:56-59, FIG. 1.)
[21.] The method for managing subscriber profile data of claim 14, wherein the intermediate system further comprises SPACE.	Beck further that the "intermediate network 335" further comprises "service management system/SPACE 250." SPACE is a service management system by Bellcore, or "Service Provisioning and Creation Environment (SPACE®) system." (See, e.g., Ex. 1010, 1:55-57, 4:16-18, 27-33, FIGS 2-3.)
[22.] The method for managing subscriber profile data of claim 13, wherein the profile management system	Beck discloses that "[c]ommunication between SAC 210 and communications agent 220 preferably uses a transmission control protocol/internet protocol (TCP/IP). TCP/IP is an

Claim Element	B(1), B(2), B(3), B(4)
communicates with the client	internet standard for packet switching between
using TCP/IP.	computing systems." (See, e.g., id., 4:53-64.)

C. Claims 1-7, 11, and 13-17 are Anticipated by An, claim 10 is rendered obvious by An in view of Bayless, and claims 14-15 and 21-22 are rendered obvious by An in view of Beck

An discloses each element of claims 1-7, 11, and 13-17. An in view of Bayless renders obvious claim 10. There is motivation to combine An and Bayless. An discloses a "system and method for allowing telephone subscribers to update over the Internet the features which are active on the telephone." (Ex. 1005, Abstract; Ex. 1014, ¶ 103.) In particular, An describes that a "subscriber can locate his personal 'telephone feature profile' on the telephone service provider's server on the Internet, access it via a password, such as his/her 'calling card' PIN, and see at a glance the features and options currently active on his line/number." (Ex. 1005, 1:30-40; Ex. 1014, ¶ 103.) "Additionally, the subscriber may submit requests to add/change/delete features, on-line." (Ex. 1005, 1:30-40.) According to An, "[e]xamples of some well known features typically available to subscribers include call forward, call waiting, ring again, speed call, message waiting, 3-way conferencing, softkey programming, and 800 services." (*Id.*, 3:15-19.)

As described above, *Bayless* discloses a graphical user interface for updating telephone system features, including a "call logging feature." (Ex. 1009, 60:35-65; Ex. 1014, ¶ 106.) Because An provides a system designed to create and modify a variety of telephone services, a skilled artisan would be readily motivated to

incorporate the known telephone call logging feature of *Bayless* with the known system of An to yield a predictable improvement of available services. (*See* Ex. 1014, ¶ 106; MPEP §§ 2143, 2144.)

An in view of Beck renders obvious claims 14-15 and 21-22. There is also motivation to combine An and Beck. In the system disclosed by An, "[s]ome features may be implemented directly with switches forming part of the PSTN 12, and other features may be implemented on peripheral processing platforms which may be, for example, AIN (advanced intelligent network) based, or IN (intelligent network) based." (Ex. 1005, 3:11-15; Ex. 1014, ¶ 108.) An's system architecture further includes "service manager programs (or simply 'service managers') running on service manager nodes 16 connected to or forming part of the PSTN 12," which manage the provision of telephone features. (Ex. 1005, 3:20-23.)

As described above, Beck discloses a profile management system topology that operates "together with [a] service management system/SPACE 250." (Ex. 1010, 4:25-34, FIGS. 2-3; Ex. 1014, ¶ 109.) Because An provides a similar system architecture as Beck, also designed to perform user service management, a skilled artisan would be readily motivated to incorporate the known intermediate SPACE service management system of Beck with the known system of An to yield a predictable improvement. (See Ex. 1014, ¶ 110; MPEP §§ 2143, 2144.)

Table C: Proposed Rejection C(1), USPN 6,031,904 to An; C(2), An in view of USPN 5,754,636 to Bayless; and C(3), An in view of USPN 5,883,946 to Beck

Claim Element	C(1), C(2), C(3)
[1a.] A method for managing, by a profile management system, subscriber profile data associated with a communications service subscribed to by a subscriber, the subscriber profile data being stored on a communications network which executes the communications service in accordance with the subscriber profile data, the method comprising:	
[1b.] receiving a subscriber request to view the subscriber profile data from a client which hosts a user interface configured to allow the subscriber to view and update the subscriber profile data;	An discloses receiving a subscriber "query for service profile" (step 214) from a client (e.g., "Internet access unit 58," connected to "Web server 50 through the Internet 54") when a subscriber requests to access subscriber profile data (e.g., "feature profiles"). The client hosts a user interface, as shown in FIGS. 4-12 (e.g., "a WWW browser such as Netscape Navigator running on the Internet access unit 58 to go to the unique URL associated With the relevant HTML pages on the Web server 50.") (See, e.g., Ex. 1005, 5:6-12, 9:6-8, FIGS. 2-12, 16; Ex. 1014, ¶ 99.)
	The <i>An Provisional</i> provides a substantively identical disclosure: a subscriber "Query for service profile" is received from "a Web browser running on a workstation." This functionality is "intended to allow an end-user (Service subscriber) to configure various services and features using an access method from their environment, such as their home computer." ( <i>See</i> , <i>e.g.</i> , Ex. 1006, pp. 16-25, 38, 49-51; Ex. 1014, ¶ 101.)
[1c.] retrieving the subscriber profile data from the	An discloses retrieving the subscriber profile data from the communications network (e.g., "the
profite data from the	mom die communications network (c.g., the

Claim Element	C(1), C(2), C(3)
communications network based upon receiving the subscriber request to view the subscriber profile data from the client;	DMS sends back the service profile" at step 216) upon receiving the subscriber request to view the subscriber profile data via "query for service profile" (step 214) from the client (e.g., "Internet access unit 58," connected to "Web server 50 through the Internet 54"). ( <i>See, e.g.,</i> Ex. 1005, 5:17-21, 9:11-13, FIGS. 2-3, 16; Ex. 1014, ¶ 99.)
	The <i>An Provisional</i> provides a substantively identical disclosure: the DMS sends back the "service profile and available services." ( <i>See</i> , <i>e.g.</i> , Ex. 1006, pp. 50-51; Ex. 1014, ¶ 101.)
[1d.] forwarding the subscriber profile data to the client;	An discloses forward the subscriber profile data by "us[ing] this information to build a customized page to be sent to the browser. This page is generated based upon HTML templates in the SSPM database. It may include various applets and HTML entities for user interaction. These are sent back to the browser for display on the browser and use by the user (step 218)." At the client, " the Web server 50 provides access to a series of HTML pages containing information about this particular DN. Once the subscriber is given access, the subscriber can navigate through the HTML pages using well understood browsing techniques." (See, e.g., Ex. 1005, 5:17-21, 9:13-19, FIGS. 2-3, 16; Ex. 1014, ¶ 100.)
	The <i>An Provisional</i> provides a substantively identical disclosure: "an application will be fired up to build a customized Service Order page  Typically it includes the subscriber's current service profile, other available services, an Applet which will react to user selection and calculates monthly cost etc. An area on this page can be used for advertising new telephone services." ( <i>See</i> , <i>e.g.</i> , Ex. 1006, pp. 50-51; Ex. 1014, ¶ 101.)

Claim Element	C(1), C(2), C(3)
[1e.] receiving a subscriber	An discloses receiving a subscriber request to
request to update the subscriber	update the subscriber profile data from the client
profile data from the client, and	(e.g., "Via a mechanism such as an HTML
	"form" or a Java "applet", a subscriber can
	activate/deactivate features and change the
	parameters of those features, on-line.") "When a
	change is submitted, this is sent back to the
	SSPM server in response to which a "request
	processing" application will be started up (step
	220)." (See Ex. 1005, 5:22-34, 9:22-24, FIGS.
	2-3, 16; Ex. 1014, ¶ 100.)
	The <i>An Provisional</i> provides a substantively
	identical disclosure: "When the subscriber
	submits his service order request [i.e. "Service
	change request"], an application [] translate[s]
	the request to a series of DMS table change
	requests." (See, e.g., Ex. 1006, pp. 50-51; Ex.
F1 C 3 C 1' 1 C	1014, ¶ 101.)
[1f.] forwarding an update for	An discloses forwarding an update for the
the subscriber profile data to the communications network	subscriber profile data to the communications network via a "service order request sent to
based upon receiving the	the DMS over the telephone company intranet
subscriber request to update the	(step 222)." (See, e.g., Ex. 1005, 5:22-34, 9:24-
subscriber profile data from the	30, FIGS. 2-3, 16; Ex. 1014, ¶ 100.)
client.	
	The An Provisional provides a substantively
	identical disclosure: "These requests will be sent
	to DMS for processing. When confirmations of
	table changes have been received, a confirmation
	will be sent to the subscriber's browser." (See,
	e.g., Ex. 1006, pp. 50-51; Ex. 1014, ¶ 101.)
[2.] The method for managing	An discloses that subscriber profile data is
subscriber profile data of claim 1, wherein the subscriber	retrieved from the communications network (e.g., "DMS 160") via at least one intermediate
profile data is retrieved from	system (e.g., "SSPM (subscriber service
the communications network	provisioning manager) Server"), which is "
via at least one intermediate	connected to/forming part of a public
system.	communications network." (See, e.g., Ex. 1005,
_	4:16-46, 8:31-36, FIGS. 2-3, 15-16; Ex. 1014, ¶

Claim Element	C(1), C(2), C(3)
	99.)
	An discloses a multiplexed switch known as DNS containing tables assuming the role of the users' profile repositories. "Tables stored on the DMS switch 160 contain tuples which indicate which features are active for a given DN. These tables assume the role of the profile repositories. The SDM can read, change, delete and add tuples to DMS tables, thus changing customer's service profiles." (See, e.g., Ex. 1005, 8:21-25.)
	An further discloses that the users' profile changes are implemented in DMS. An illustrates the timing diagram of the profile update function in DMS. (See, e.g., id., 8:31-36, Fig. 16.)
	The <i>An Provisional</i> provides a substantively identical disclosure: the intermediate system "SSPM (subscriber service provisioning manager) Server" is described in detail and alternately referred to as the "JavaTel Server." ( <i>See</i> , <i>e.g.</i> , Ex. 1006, pp. 25-31, 38, 49-51.; Ex. 1014, ¶ 101.)
[3.] The method for managing subscriber profile data of claim 1, wherein the update for the subscriber profile data is forwarded to the communications network via at least one intermediate system.	An discloses that subscriber profile data is retrieved from the communications network (e.g., "DMS 160") via at least one intermediate system (e.g., "SSPM (subscriber service provisioning manager) Server"), which is " connected to/forming part of a public communications network." (See, e.g., Ex. 1005, 4:16-46, 8:31-36, FIGS. 2-3, 15-16; Ex. 1014, ¶ 99.)
	An discloses a multiplexed switch known as DNS containing tables assuming the role of the users' profile repositories. "Tables stored on the DMS switch 160 contain tuples which indicate which features are active for a given DN. These tables assume the role of the profile repositories.

Claim Flamout	C(1) $C(2)$ $C(3)$
Claim Element	C(1), C(2), C(3) The SDM can read, change, delete and add
	tuples to DMS tables, thus changing customer's
	service profiles." (See, e.g., Ex. 1005, 8:21-25.)
	(300, 0.8.) = 11 10 00, 0.21 20 0,
	An further discloses that the users' profile
	changes are implemented in DMS. An illustrates
	the timing diagram of the profile update function
	in DMS. (See, e.g., id., 8:31-36, FIG. 16.)
	The <i>An Provisional</i> provides a substantively
	identical disclosure. (See, e.g., Ex. 1006, pp. 25-
	31, 38, 49-51; Ex. 1014, ¶ 101.)
[4.] The method for managing	An discloses that subscriber profile data is
subscriber profile data of claim	retrieved from the communications network
1, wherein the profile	(e.g., "DMS 160") via at least one intermediate
management system comprises	system (e.g., "SSPM (subscriber service
a server.	provisioning manager) Server"), which is "
	connected to/forming part of a public
	communications network." ( <i>See, e.g.</i> , Ex. 1005, 4:16-46, 8:31-33, FIGS. 2-3, 15-16.)
	4.10-40, 0.31-33, 11GS. 2-3, 13-10.)
	<i>An</i> discloses the SSPM server connected to the
	Internet providing the interface through which
	the user can access and modify his/her feature
	profile. "An SSPM server is shown connected to
	the Internet also, and this provides the interface
	through which the user can access and modify
	his/her feature profile. Changes requested are
	communicated through the telephone company intranet to the SDM 162 to the DMS where they
	are implemented. The SDM 162 performs
	validation along the way (See, e.g., id., 8:31-37;
	Ex. 1014, ¶ 101.)
	"
	The An Provisional provides a substantively
	identical disclosure. (See, e.g., Ex. 1006, pp. 25-
[5] The model of C.	31, 38, 49-51.)
[5.] The method for managing	An discloses a "service change agent 104"
subscriber profile data of claim 1, wherein the user interface is	application that provides "a graphical user interface which presents the user's service
1, wherein the user illerrace is	interface which presents the user's service

Claim Element	C(1), C(2), C(3)
a graphical user interface.	profile, allows the user 100 to modify it, and sends appropriate transactions to the requisite service managers 102 for update." Exemplary HTML pages which allow a subscriber to view and update their feature profiles are shown in FIGS. 5-12. (See, e.g., Ex. 1005, 5:35-36, 6:55-59, FIGS. 5-12.)  The An Provisional provides a substantively identical disclosure: (See, e.g., Ex. 1006, pp. 16-24, 49-51.)
[6.] The method for managing subscriber profile data of claim 1, wherein the communications service comprises positive identification.	An discloses a technique to access profile data using a user's phone number including an area code associated with a password (PIN): "The user completes the Login HTML page by typing in a phone number, PIN etc, and submits this as a further HTTP request (step 208). The SSPM server sends this information to an authentication server (step 210) which, after successfully authenticating the user information returns an "identity authenticated" message back to the SSPM server (step 212). If access is denied, then the user is given another opportunity to enter identification information (step 213)." (See, e.g., Ex. 1005.)
	The <i>An Provisional</i> provides a substantively identical disclosure: the system "first presents the 'Login HTML Page'. This page asks the subscriber to provide his phone number and a PIN number. When ITSOS receives the phone number and PIN, it performs authentication procedure." ( <i>See, e.g.,</i> Ex. 1006, pp. 3, 16, 49-51.)
[7.] The method for managing subscriber profile data of claim 6, wherein the communications network comprises a telecommunications network.	An discloses "a feature ordering system for use in connection with a telephone network," such as "PSTN 12" in FIGS. 2-3. For example, "[t]he subscriber has (or has access to) an Internet access unit 58 connectable to the Internet 54 or similar communications network through the

	G(1), $G(2)$ , $G(3)$
Claim Element	C(1), C(2), C(3)
	PSTN 12 and an Internet service provider 60." (See, e.g., Ex. 1005, 1:66-2:4, 4:48-51, FIGS. 2-
	3.)
	3.)
	The <i>An Provisional</i> provides a substantively
	identical disclosure. (See, e.g., Ex. 1006, pp. 1-
	2, 15, 27, 38.)
[10.] The method for managing	Bayless discloses a reporting system that
subscriber profile data of claim	generates reports (e.g., "a call log database")
9, wherein a reporting system	containing information about calling parties
generates reports comprising	attempting to connect to the subscriber (e.g.,
calling parties attempting to	"each call generated or received by a user.") The
connect to the subscriber,	call log database may include information such
indicating each calling party	as time stamps of when a call began and parties
successfully connected to the	to the call (calling parties successfully connected
subscriber and each calling	to the subscriber), as well as whether a call went
party not successfully	to voicemail and the time duration of a voicemail
connected to the subscriber.	message (calling parties not successfully
	connected to the subscriber). (See, e.g., Ex.
	1009, 60:35-41, 52-55, 60-63, 61:4-15, FIG. 111.)
[11.] The method for managing	An discloses controlling access to the subscriber
subscriber profile data of claim	profile data using "a Personal Identity Number
1, further comprising:	(PIN), which acts as a "password" to
controlling access to the	authenticate the customer." The access control
subscriber profile data, using	system "performs subscriber authentication by
an access control system, to	requesting the PIN (see FIG. 4 for example)
only allow authorized	through the browser." This access control is also
subscribers to view and request	illustrated through FIG. 16, providing "a Login
updates to the subscriber	HTML page for display by the browser (step
profile data.	206). The user completes the Login HTML page
	by typing in a phone number, PIN etc, and
	submits this as a further HTTP request (step
	208). The SSPM server sends this information to
	an authentication server (step 210) which, after successfully authenticating the user information
	returns an "identity authenticated" message back
	to the SSPM server (step 212)." (See, e.g., Ex.
	1005, 1:34-38, 5:11-21, 6:7-9, 8:64-9:2, FIGS. 4,
	16.)

Claim Element	C(1), C(2), C(3)
	The An Provisional provides a substantively
	identical disclosure: the system "first presents
	the "Login HTML Page". This page asks the
	subscriber to provide his phone number and a
	PIN number. When ITSOS receives the phone number and PIN, it performs authentication
	procedure." (See, e.g., Ex. 1006, pp. 3, 16, 49-
	51.)
[13a.] A method for managing	An discloses this element. See Table C, Element
subscriber profile data	[1a], above.
associated with a	
communications service	
subscribed to by a subscriber,	
the subscriber profile data	
being stored on a	
communications network	
which executes the	
communications service in	
accordance with the subscriber	
profile data, the method comprising:	
[13b.] receiving, from a profile	An discloses this element. See Table C, Element
management system, a	[1b], above.
subscriber request to view the	[20], 600 (0)
subscriber profile data, the	
subscriber request to view the	
subscriber profile data being	
received from the profile	
management system based	
upon the profile management	
system receiving the subscriber	
request to view the subscriber	
profile data from a client which hosts a user interface	
configured to allow the	
subscriber to view and update	
the subscriber profile data;	
[13c.] forwarding the	An discloses this element. See Table C,
subscriber profile data to the	Elements [1c] and [1d], above.

Claim Element	C(1), C(2), C(3)
profile management system	
based upon receiving the	
subscriber request to view the	
subscriber profile data from the	
profile management system,	
the profile management system	
being configured to forward the	
subscriber profile data to the	
client when the profile	
management system receives	
the subscriber profile data;	
[13d.] receiving an update for	An discloses this element. See Table C,
the subscriber profile data from	Elements [1e] and [1f], above.
the profile management	
system, the update for the	
subscriber profile data being	
received from the profile	
management system based	
upon the profile management	
system receiving a subscriber	
request to update the subscriber	
profile data from the client, wherein the communications	
network executes the communications service in	
accordance with the updated	
subscriber profile data.	
[14.] The method for managing	An discloses that subscriber profile data is
subscriber profile data of claim	retrieved from the communications network
13, wherein the subscriber	(e.g., "DMS 160") via at least one intermediate
profile data is forwarded to the	system (e.g., "SSPM (subscriber service
profile management system via	provisioning manager) Server"), which is "
at least one intermediate	connected to/forming part of a public
system.	communications network." (See, e.g., Ex. 1005,
	4:16-46, 8:31-36, FIGS. 2-3, 15-16; Ex. 1014, ¶
	99.)
	An discloses a multiplexed switch known as
	DNS containing tables assuming the role of the
	users' profile repositories. "Tables stored on the

Claim Element	C(1), C(2), C(3)
Cium Dienent	DMS switch 160 contain tuples which indicate
	which features are active for a given DN. These
	tables assume the role of the profile repositories.
	The SDM can read, change, delete and add
	tuples to DMS tables, thus changing customer's
	service profiles." (See, e.g., Ex. 1005, 8:21-25.)
	An further discloses that the users' profile
	changes are implemented in DMS. An illustrates
	the timing diagram of the profile update function
	in DMS. (See, e.g., id., 8:31-36, FIG. 16.)
	The An Provisional provides a substantively
	identical disclosure: the intermediate system
	"SSPM (subscriber service provisioning
	manager) Server" is described in detail and also
	referred to as the "JavaTel Server." ( <i>See, e.g.,</i> Ex. 1006, pp. 25-31, 38, 49-51; Ex. 1014, ¶ 101.)
	Ex. 1000, pp. 23-31, 36, 49-31, Ex. 1014,    101.)
	Beck further discloses this profile management
	system topology (e.g., FIGS. 2 and 3). "One of
	the SACs 210 processes the order and sends a
	provisioning message to an intermediate network
	335 in system 310. The intermediate network
	335 includes communications agent 220, queue
	230, memory 280, and SPI 240 shown in FIG.
	2". Forwarding to the profile management system via at least on intermediate system occurs
	when "one of the SACs 210 receive a message
	from intermediate network 335" (See, e.g.,
	Ex. 1010, 4:27-31, 47-48, FIGS 2-3.)
[15.] The method for managing	An and the An Provisional disclose this element.
subscriber profile data of claim	See Table C, Elements [14], above.
13, wherein the update for the	, , , , , , , , , , , , , , , , , , , ,
subscriber profile data is	Beck discloses this element. See Table C,
received from the profile	Elements [14], above.
management system via at least	
one intermediate system.	
[16.] The method for managing	An discloses a technique to access profile data
subscriber profile data of claim	using a user's phone number including an area

C(1), C(2), C(3)
code associated with a password (PIN): "The
user completes the Login HTML page by typing
in a phone number, PIN etc, and submits this as a
further HTTP request (step 208). The SSPM server sends this information to an authentication server (step 210) which, after successfully authenticating the user information returns an "identity authenticated" message back to the SSPM server (step 212). If access is denied, then the user is given another opportunity to enter identification information (step 213)." ( <i>See, e.g.</i> , Ex. 1005, 8:63-9:4.)
The <i>An Provisional</i> provides a substantively identical disclosure: the system "first presents the "Login HTML Page". This page asks the subscriber to provide his phone number and a PIN number. When ITSOS receives the phone number and PIN, it performs authentication procedure." ( <i>See, e.g.,</i> Ex. 1006, pp. 3, 16, 49-51.)
An discloses "a feature ordering system for use
in connection with a telephone network," such as
"PSTN 12" in FIGS. 2-3. For example, "[t]he
subscriber has (or has access to) an Internet access unit 58 connectable to the Internet 54 or
similar communications network through the PSTN 12 and an Internet service provider 60." (See, e.g., Ex. 1005, 1:66-2:4; 4:48-51; FIGS. 2-3.)
The <i>An Provisional</i> provides a substantively identical disclosure. ( <i>See, e.g.,</i> Ex. 1006, pp. 1-2, 15, 27, 38.)
Beck further that the "intermediate network 335"
further comprises "service management
system/SPACE 250." SPACE is a service
management system by Bellcore, or "Service
Provisioning and Creation Environment (SPACE®) system." (See, e.g., Ex. 1010, 1:55-

Claim Element	C(1), C(2), C(3)
	57, 4:16-18, 27-33, FIGS 2-3.)
[22.] The method for managing	<i>Beck</i> discloses that "[c]ommunication between
subscriber profile data of claim	SAC 210 and communications agent 220
13, wherein the profile	preferably uses a transmission control
management system	protocol/internet protocol (TCP/IP). TCP/IP is an
communicates with the client	internet standard for packet switching between
using TCP/IP.	computing systems." (See, e.g., id., 4:53-64.)

## D. Claims 1-7, 13-17, and 22 are Anticipated by *Elliott*, claim 10 is rendered obvious by *Elliott* in view of *Bayless*, and claims 14-15 and 21-22 are rendered obvious by *Elliott* in view of *Beck*

Elliott discloses each element of claims 1-7, 13-17, and 22. Elliott in view of Bayless renders obvious claim 10. There is motivation to combine Elliott and Bayless. Elliott discloses a system for handling "telephone calls, data, and other multimedia information [in] a hybrid network which includes transfer of information across the internet." (Ex. 1007, Abstract; Ex. 1014, ¶ 116.) In particular, *Elliott* discloses utilizing "user profile information" throughout the system to specify, enable, and control numerous system functions. (Ex. 1007, Abstract.) For example, *Elliott* describes an Intelligent Network "call processing architecture for processing voice, fax and related services." (Id., 13:5-18.) Some services include "number translation services, automatic or manual operator services, validation services and database services." (Id., 13:5-18.) Elliott confirms that "[t]he addition of new value added services is very simple and new features can be added by additional software and configuration[.]" (Id., 16:7-10.)

As described above, *Bayless* discloses a graphical user interface for updating telephone system features, including a "call logging feature." (Ex. 1009, 60:35-65;

Ex. 1014, ¶ 117.) Because *Elliott* provides a system designed to easily integrate new telecommunications system services, a skilled artisan would be readily motivated to incorporate the telephone call logging feature of *Bayless* with the system of *Elliott* to yield a predictable improvement. (*See* Ex. 1014, ¶ 118; MPEP §§ 2143, 2144.)

Elliott in view of *Beck* renders obvious claims 14-15 and 21-22. There is also motivation to combine *Elliott* and *Beck*. Elliott describes an Intelligent Network "call processing architecture for processing voice, fax and related services." (Ex. 1007, 13:5-18; Ex. 1014, ¶ 121.) It includes "a hybrid (internet-telephony) switch 221 [that] switches circuits on a public switched telephone network (PSTN) 256 with TCP/IP or UDP/IP ports on an internet network 295," and is "composed of PSTN network interfaces (247, 260), high-speed Internet network interfaces (271, 272, 274), a set of Digital Signal Processor (DSP)s (259, 263), a time-division multiplexed bus 262, and a high-speed data bus 275." (Ex. 1007, 85:58-67.) "The switch 221 may also query an external Service Control Point (SCP) 276 on the internet to request routing instructions." (*Id.*, 86:12-14.)

As described above, *Beck* discloses a profile management system topology including an intermediate network for generating and updating call processing records, which operates "together with [a] service management system/SPACE 250." (Ex. 1010, 4:25-34, FIGS. 2-3; Ex. 1014, ¶ 122.) One of ordinary skill in the art would understand that the SCP system used in *Elliot* is the same as the one

disclosed in *Beck*, as *Elliot* classifies the switching points (SPs) into SSP, STP, and SCP. (Ex. 1007, 105:67-106:3; Ex. 1014, ¶ 122.) Because *Elliott* provides a similar system architecture as *Beck*, also designed to perform user service management (see above), a skilled artisan would be readily motivated to incorporate the known intermediate SPACE service management system of *Beck* with the known system of *Elliott* to yield a predictable improvement of the service management system. (*See* Ex. 1014, ¶ 122, MPEP §§ 2143, 2144.)

Table D: Proposed Rejection D(1), USPN 6,335,927 to *Elliott*; D(2), *Elliott* in view of USPN 5,754,636 to *Bayless*; and D(3), *Elliott* in view of USPN 5,883,946 to *Beck* 

Claim Element	D(1), D(2), D(3)
[1a.] A method for managing,	
by a profile management	
system, subscriber profile data	
associated with a	
communications service	
subscribed to by a subscriber,	
the subscriber profile data	
being stored on a	
communications network	
which executes the	
communications service in	
accordance with the subscriber	
profile data, the method	
comprising:	
[1b.] receiving a subscriber	Elliott discloses a user interface "accessible
request to view the subscriber	through PC software (i.e., PC Client messaging
profile data from a client which	interface), an ARU or a VRU, and a World Wide
hosts a user interface	Web (WWW) Browser" that enables subscribers
configured to allow the	to control their profile data (e.g., "User Account
subscriber to view and update	Profile"). The user can request their account
the subscriber profile data;	information through the "application profile,"
	and can update the user profile data by accessing

Claim Element	D(1), D(2), D(3)
	the user's database through a webserver
	interface. "The application profile provides an
	intelligent interface between the user and his
	account information, which resides in the user
	account directory. The User Account Directory
	accesses the individual account information of
	users. Users are able to read and write to the
	directory, making updates to their accounts."
	(See, e.g., Ex. 1007, 61:28-62:67, FIGS. 40, 42,
	57-61; Ex. 1014, ¶¶ 113, 114.)
[1c.] retrieving the subscriber	Elliott discloses that the "User Account
profile data from the	Directory" retrieves the subscriber's "individual
communications network based	account information" based upon receiving the
upon receiving the subscriber	subscriber request through the disclosed
request to view the subscriber	application. (See, e.g., Ex. 1007, 61:28-62:67,
profile data from the client;	FIGS. 40, 42, 57-61; Ex. 1014, ¶¶ 113, 114.)
[1d.] forwarding the subscriber	Elliott discloses that the "user is able to access
profile data to the client;	account information through the application
	profile [which] provides an intelligent
	interface between the user and his account
	information," forwarding the profile data to the
	client. (See, e.g., Ex. 1007, 61:28-62:67, FIGS.
	40, 42, 57-61.)
[1e.] receiving a subscriber	Elliott discloses that users "are able to read and
request to update the subscriber	write to the directory, making updates to their
profile data from the client, and	accounts." Further, "the user interface is used to
	update [the user's] profile and to access his
	messages." (See, e.g., id., 61:28-62:67, FIGS.
	40, 42, 57-61; Ex. 1014, ¶¶ 113, 114.)
[1f.] forwarding an update for	Elliott discloses that "the user is able to modify
the subscriber profile data to	his account, customizing his application by
the communications network	making feature/functionality updates," which are
based upon receiving the	forwarded to the communications network based
subscriber request to update the	upon the subscriber's "writ[ing] to" the
subscriber profile data from the	directory, "making updates to their accounts."
client.	(See, e.g., Ex. 1007, 61:28-62:67, FIGS. 40, 42,
F0.1 F0	57-61; Ex. 1014, ¶¶ 113, 114.)
[2.] The method for managing	Elliott discloses intermediate system "Web
subscriber profile data of claim	Server 450" via which profile data is retrieved
1, wherein the subscriber	from the communications network. (See, e.g.,

Claim Element	D(1), D(2), D(3)
profile data is retrieved from	Ex. 1007, FIG. 40.)
the communications network	
via at least one intermediate	
system.	
[3.] The method for managing	Elliott discloses intermediate system "Web
subscriber profile data of claim	Server 450" via which the update for the
1, wherein the update for the	subscriber profile data is forwarded to the
subscriber profile data is	communications network. (See, e.g., id., FIG.
forwarded to the	40.)
communications network via at	
least one intermediate system.	Elliett disalogos "Wah Comyon 150" in the profile
[4.] The method for managing subscriber profile data of claim	Elliott discloses "Web Server 450" in the profile
1, wherein the profile	management system. (See, e.g., id., FIG. 40.)
management system comprises	
a server.	
[5.] The method for managing	Elliott discloses that users have "control over
subscriber profile data of claim	their profile [via] a graphical user interface," as
1, wherein the user interface is	further illustrated in FIGS. 57-67. (See, e.g., id.,
a graphical user interface.	61:28-30, FIGS. 57-67.)
[6.] The method for managing	Elliott discloses that "[a]ccess to the Message
subscriber profile data of claim	Center or Profile Management is limited to
1, wherein the communications	authorized users. Users are prompted to enter
service comprises positive	their User ID and Password before accessing the
identification.	Message Center or Profile Management." (See,
	e.g., id., 171:39-61, FIG. 65.)
[7.] The method for managing	Elliott discloses that the communications
subscriber profile data of claim	network comprises a telecommunications
6, wherein the communications	network: "Internet 1910 is tied to the Public
network comprises a	Switched Network (PSTN) 1960 via a gateway
telecommunications network.	1950. The gateway 1950 in a preferred
	embodiment provides a virtual connection from a circuit switched call in the PSTN 1960 and some
	entity in the Internet 1910." (See, e.g., id.,
	18:19-23.)
[10.] The method for managing	Bayless discloses a reporting system that
subscriber profile data of claim	generates reports (e.g., "a call log database")
9, wherein a reporting system	containing information about calling parties
generates reports comprising	attempting to connect to the subscriber (e.g.,
calling parties attempting to	"each call generated or received by a user.") The

Claim Element	D(1), D(2), D(3)
connect to the subscriber,	call log database may include information such
indicating each calling party	as time stamps of when a call began and parties
successfully connected to the	to the call (calling parties successfully connected
subscriber and each calling	to the subscriber), as well as whether a call went
party not successfully	to voicemail and the time duration of a voicemail
connected to the subscriber.	message (calling parties not successfully
connected to the subscriber.	connected to the subscriber). (See, e.g., Ex.
	1009, 60:35-41, 52-55, 60-63, 61:4-15, FIG.
	111.)
[12a] A mathod for managing	,
[13a.] A method for managing	Elliott discloses this element. See Table D,
subscriber profile data	Element [1a], above.
associated with a	
communications service	
subscribed to by a subscriber,	
the subscriber profile data	
being stored on a communications network	
which executes the	
communications service in	
accordance with the subscriber	
profile data, the method	
comprising:	Elliott disalosos this alament Cas Table D
[13b.] receiving, from a profile	Elliott discloses this element. See Table D,
management system, a	Element [1b], above.
subscriber request to view the	
subscriber profile data, the	
subscriber request to view the	
subscriber profile data being	
received from the profile	
management system based	
upon the profile management system receiving the subscriber	
request to view the subscriber	
profile data from a client which hosts a user interface	
configured to allow the	
subscriber to view and update	
the subscriber profile data;	Elliatt disalosas this alamant Cas Table D
[13c.] forwarding the	Elliott discloses this element. See Table D,
subscriber profile data to the	Elements [1c] and [1d], above.

Claim Element	D(1), D(2), D(3)
profile management system	
based upon receiving the	
subscriber request to view the	
subscriber profile data from the	
profile management system,	
the profile management system	
being configured to forward the	
subscriber profile data to the	
client when the profile	
management system receives	
the subscriber profile data;	
[13d.] receiving an update for	Elliott discloses this element. See Table D,
the subscriber profile data from	Elements [1e] and [1f], above.
the profile management	
system, the update for the	
subscriber profile data being	
received from the profile	
management system based	
-	
_	
-	
	-
-	-
· · · · · · · · · · · · · · · · · · ·	
1 -	(See, e.g., Ex. 1007, FIG. 40.)
	Dook from the displaces this most !
system.	
	<del>-</del>
subscriber profile data being received from the profile	Elliott discloses intermediate system "Web Server 450" via which the subscriber profile data is forwarded to the profile management system. (See, e.g., Ex. 1007, FIG. 40.)  Beck further discloses this profile management system topology (e.g., FIGS. 2 and 3). "One of the SACs 210 processes the order and sends a provisioning message to an intermediate network 335 in system 310. The intermediate network 335 includes communications agent 220, queue 230, memory 280, and SPI 240 shown in FIG. 2". Forwarding to the profile management

Claim Element	D(1), D(2), D(3)
	system via at least on intermediate system occurs when "one of the SACs 210 receive a message from intermediate network 335" ( <i>See, e.g.,</i> Ex. 1010, 4:27-31, 47-48, FIGS 2-3.)
[15.] The method for managing subscriber profile data of claim 13, wherein the update for the subscriber profile data is received from the profile management system via at least one intermediate system.	Elliott discloses this element. See Table D, Elements [14], above.  Beck discloses this element. See Table D, Elements [14], above.
[16.] The method for managing subscriber profile data of claim 13, wherein the communications service comprises positive identification.	Elliott discloses that "[a]ccess to the Message Center or Profile Management is limited to authorized users. Users are prompted to enter their User ID and Password before accessing the Message Center or Profile Management." (See, e.g., Ex. 1007, 171:39-61, FIG. 65.)
[17.] The method for managing subscriber profile data of claim 16, wherein the communications network comprises a telecommunications network.	Elliott discloses that the communications network comprises a telecommunications network: "Internet 1910 is tied to the Public Switched Network (PSTN) 1960 via a gateway 1950. The gateway 1950 in a preferred embodiment provides a virtual connection from a circuit switched call in the PSTN 1960 and some entity in the Internet 1910." (See, e.g., id., 18:19-23.)
[21.] The method for managing subscriber profile data of claim 14, wherein the intermediate system further comprises SPACE.	Beck further that the "intermediate network 335" further comprises "service management system/SPACE 250." SPACE is a service management system by Bellcore, or "Service Provisioning and Creation Environment (SPACE®) system." (See, e.g., Ex. 1010,1:55-57, 4:16-18, 27-33, FIGS 2-3.)
[22.] The method for managing subscriber profile data of claim 13, wherein the profile management system communicates with the client using TCP/IP.	Elliott discloses that a World Wide Web (WWW) Browser that enables subscribers, or customers, to control their profile data (e.g., "User Account Profile"). The user is able to request their account information through the "application profile." As Elliott describes, "[t]he application profile provides an intelligent

Claim Element	D(1), D(2), D(3)
	interface between the user and his account
	information, which resides in the user account
	directory. The User Account Directory accesses
	the individual account information of users.
	Users are able to read and write to the directory,
	making updates to their accounts." (See, e.g.,
	Ex. 1007, 61:28-62:67, FIGS. 40, 57-61; Ex.
	1014, ¶ 113.)
	Beck discloses that "[c]ommunication between
	SAC 210 and communications agent 220
	preferably uses a transmission control
	protocol/internet protocol (TCP/IP). TCP/IP is an
	internet standard for packet switching between
	computing systems." (See, e.g., Ex. 1010, 4:53-
	64.)

## VII. CONCLUSION

For the foregoing reasons, Petitioner respectfully requests institution of IPR for Claims 1-22 of the '714 patent because there is a reasonable likelihood that Petitioner will prevail with respect to at least one of these claims challenged in this Petition. Petitioner respectfully requests that these claims be declared unpatentable and canceled.

Respectfully submitted,

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Attorney Docket: COX-714IPR

## IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

Inter partes Review Case No. IPR2015-\_\_\_\_\_

Inter partes Review of: U.S. Patent No. 7,907,714

Issued: March 15, 2011 To: Paul G. Baniak et al.

For: Profile Management System Including User Interface for Accessing and

Maintaining Profile Data of User Subscribed Telephony Services

## CERTIFICATE OF SERVICE UNDER 37 C.F.R. § 42.6(e) AND 42.105(a)

Dear Sir:

Pursuant to 37 C.F.R. § 42.6(e) and 42.105(a), I hereby certify that on May 19, 2015, I caused a complete copy of the Petition for *Inter Partes* Review of U.S. Patent No. 7,907,714 and all supporting exhibits to be served on the Patent Owner of the subject patent at the correspondence address of record as follows:

By EXPRESS MAIL® to:

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