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UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

CISCO, INC.
Petitioner

v.

TQ DELTA, LLC
Patent Owner

Case No. IPR2016-01007
Patent No. 8,432,956

PATENT OWNER'S RESPONSE UNDER 37 CFR §42.120

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EXHIBIT LIST

Ex. 2001	Declaration of Douglas Chrissan, PhD for Inter Partes Review Nos. IPR2016-01006, -01007, -01008, -01009
Ex. 2002	Hargrave's Communications Dictionary (2001) at pp. 404, 485
Ex. 2003	U.S. Pat. Pub. No. 20050190826
Ex. 2004	Webster's Unabridged Dictionary of the English Language (1989 ed.) at p. 1217
Ex. 2005	Transcript of 2/8/17 Deposition of Sayfe Kiaei
Ex. 2006	ITU-T G.992.1 (6/99) Series G: Transmission Systems and Media, Digital Systems and Networks – Asymmetric Digital Subscriber Line (ADSL) Transceivers

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I. INTRODUCTION

The Board has instituted *inter partes* review of claims 1-10 of U.S. Pat. No. 8,432,956 ("the '956 patent") based on a single Ground—Petitioner's allegations of obviousness in view of a combination of Milbrandt, Hwang, and ANSI T1.413.[1] Patent Owner, however, respectfully submits that for purposes of institution the Board accepted as true numerous unsupported factual statements by Petitioner's expert that are demonstrably incorrect. Indeed, based on his testimony at his deposition, Petitioner's expert (Dr. Sayfe Kiaei) is unknowledgeable and unqualified regarding the technical issues in this proceeding. Patent Owner provides in this Response additional detail, technical explanations from its own qualified expert (Dr. Douglas Chrissan), and further legal support to clarify the deficiencies in the Petition.

First, Petitioner has not shown that it would have been obvious in a multicarrier transceiver (such as a DSL modem) to transmit or receive a diagnostic message having "*an array representing power level per subchannel information*"

[1] "Petitioner" refers to Petitioner Cisco, Inc. In connection with a separate petition (IPR2017-00422), Arris Group, Inc. has requested joinder with this proceeding, a request that Patent Owner does not oppose. Decisions on that petition and Arris' motion for joinder, however, have not yet issued.

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