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[Your Name]

[Your Title]

[Your Company]

[Street Address, City, State ZIP]

May 14, 2026

[Opposing Counsel Name]

[Firm Name]

[Address]

**Re: U.S. Patent No. 11284475 — Response to Assertion of Infringement**

Dear Counsel,

We acknowledge receipt of your correspondence asserting infringement of U.S. Patent No. 11284475 (the "11284475 Patent"). After preliminary review, we have substantial concerns about the validity, enforceability, and scope of the asserted claims, summarized below. We reserve all rights and defenses.

## **1. Subject Patent — Summary**

Here is a concise summary of U.S. Patent 11,284,475.

Summary of U.S. Patent 11,284,475

Title: Wireless communication method using BSS identifier and wireless communication terminal using same

Assignee: Wilus Institute of Standards and Technology Inc.

Inventors: Geonjung Ko, Woojin Ahn, Juhjung Son, Jinsam Kwak

Filing Date: October 1, 2019

Issue Date: March 22, 2022

Abstract:

A wireless communication method using a Basic Service Set (BSS) identifier is disclosed. A base wireless communication terminal generates a trigger frame for triggering uplink transmission based on random access of at least one wireless communication terminal and transmits the trigger frame in a Physical Layer...

## **2. Validity Concerns under 35 U.S.C. § 102 — Prior Art**

We have identified prior-art references that, in our preliminary view, anticipate one or more asserted claims of the 11284475 Patent:

### Analysis of Prior Art for U.S. Patent 11,284,475

This analysis identifies and examines the most relevant prior art cited during the prosecution of U.S. Patent 11,284,475 ('475 patent). The focus is on determining whether these references potentially anticipate the patent's independent claims (1, 8, and 15) under 35 U.S.C. § 102. Anticipation requires that a single prior art reference discloses every element of a claimed invention.

The independent claims of the '475 patent generally cover a method and system where a base station (e.g., a Wi-Fi access point) transmits a trigger frame to initiate random-access uplink communication. The key inventive concept is that when this trigger frame is intended for a terminal that is not associated with the base station's Basic Service Set (BSS), the transmission must use a Physical Layer Protocol Data Unit (PPDU) format that includes a "BSS color" field. The BSS color is an identifier that helps differentiate traffic from overlapping networks, a key feature of the IEEE 802.11ax (Wi-Fi 6) standard.

Based on a review of the cited references,...

### **3. Obviousness under 35 U.S.C. § 103**

Independent of § 102, we believe the asserted claims are obvious in view of combinations of prior art that a person having ordinary skill in the art would have been motivated to combine:

#### Obviousness Analysis of U.S. Patent 11,284,475 under 35 U.S.C. § 103

This analysis evaluates whether the independent claims (1, 8, and 15) of U.S. Patent 11,284,475 ('475 patent) would have been obvious to a Person Having Ordinary Skill in the Art (PHOSITA) at the time of the invention. The analysis is based on the combination of prior art references identified in the preceding section, primarily US 2016/0113009 A1 (Vermani '009) and US 2017/0064730 A1 (Kim '730).

#### Legal Standard for Obviousness

Under 35 U.S.C. § 103, a patent claim is invalid as obvious if the differences between the claimed invention and the prior art are such that the subject matter as a whole would have been obvious at the time the invention was made to a PHOSITA. The analysis considers the scope and content of the prior art, the differences between the prior art and the claims at issue, and the level of ordinary skill in the art. A key consideration, as established in *KSR Int'l Co. v. Teleflex Inc.*, is whether there was an apparent reason to combine the known elements in the way the patent claims, such as to...

### **4. Request**

In light of the foregoing, we request that your client (i) provide a detailed claim chart identifying each accused product or service and mapping every limitation of each asserted claim, (ii) identify any prior art known to your client, including any references cited during prosecution or reexamination, and (iii) substantiate the basis for any damages or licensing demand. We are prepared to discuss the matter further once we have received and reviewed the foregoing.

Sincerely,

**[Your Name]**

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