REMARKS/ARGUMENTS

After the foregoing Amendment, claims 1-2, 8-12, 14-17, and 19-20 are currently pending in this application with claims 1, 11 and 16 being independent. Claims 6 and 7 have been canceled without prejudice. Claims 3-5, 13 and 18 were previously canceled. Claims 1, 11, and 16 are amended.

Claim Rejections - 35 U.S.C. § 103

Claims 1, 2, 11, 12, 16, and 17 are rejected under pre-AIA 35 U.S.C. 103(a) as being unpatentable over to Yu et al. (US 2011/0098043) (hereinafter Yu) in view of Pirzada et al. (US 2006/0073847) (hereinafter Pirzada).

Claims 8, 15, and 20, are rejected under pre-AIA 35 U.S.C. 103(a) as being unpatentable over Yu and Pirzada as applied to claims 1, 11, and 16 above, and further in view of Hakola et al. (US 2013/0013926) (hereinafter Hakola).

Claim 9 is rejected under pre-AIA 35 U.S.C. 103(a) as being unpatentable over Yu as applied to claim 1 above, and further in view of Van Phan et al. (US 2015/0065154) (hereinafter Van Phan).

Claims 10, 14, and 19, are rejected under pre-AIA 35 U.S.C. 103(a) as being unpatentable over Yu and Pirzada as applied to claims 1, 11, and 16 above, and further in view of Fodor et al. (US 2014/0122607) (hereinafter Fodor).

Applicant respectively traverses the rejection and submits that independent claims 1, 11, and 16 recite features not taught, suggested, or otherwise yielded by the cited reference.

Claim 1, as amended herein, recites in part:

> A method for establishing a wireless local area network . . . comprising:
>
> . . .
>
> transmitting a configuration message with configuration information associated with the second WLAN ProSe capable WTRU
>
> . . .
>
> wherein the configuration message with configuration information associated with the second WLAN ProSe capable WTRU is an indication to establish the WLAN ProSe connection.

Claims 11 and 16, as amended herein, recite similar language.

None of the cited references, alone or in combination, teach or suggest that transmitting the configuration message is an indication to establish the WLAN ProSe connection. Yu teaches a method in which the DRSF supplies parameters such as allocated channel, data rate, and maximum allocated transmit power by generating a resource allocation token, which the "DRSF . . . provides to at least one of the terminal apparatuses that is party to the D2D connection." In paragraph [0074], the DRSF "includ[es] [the] resource allocation token in a D2D <u>connection</u> <u>establishment response</u> that may be sent . . . in response to a D2D connection establishment request." (emphasis added).

Nothing in Yu indicates implicitly or explicitly that the resource allocation token directs initiation of the D2D connection. To the contrary, paragraph [0074] explains that the role of the resource allocation token is "to limit the possibility of

the D2D connection interfering with in-band cellular communications." As Paragraphs [0083], [0091], and [0107] thus further support, resource allocation merely <u>facilitates</u> establishment of the D2D connection by designating the necessary parameters. Yu does not mention any additional contents or purposes of the connection establishment response along with which the resource allocation token is sent and, therefore, is silent with respect to any indicative role of such message.

Neither Pirzada nor Hakola correct this deficiency. Pirzada teaches a method for switching between infrastructure and ad-hoc modes of communication in an access point station without assistance from a cellular network. It does not teach a network transmitting a configuration message as any indication to establish a WLAN ProSe connection.

While Hakola does discuss methods for facilitating transition from a cellular connection to a D2D connection, the reference teaches away from any implementation wherein the configuration message indicates to establish a connection. Paragraphs [0039] describes the MME generating a D2D security key combination value and "sending the D2D security key combination value to each of the mobile terminals separately, via individualized, secured connections to each respective mobile terminal." Paragraph [0040] describes the mobile terminals deconstructing the D2D security key combination value to determine a peer device's D2D security key. Finally, Paragraph [0041] then explains that the mobile terminal uses the security key combination to cipher and decipher outgoing and

incoming communications. Nowhere does Hakola discuss the security configuration information triggering a D2D connection.

Rather, Hakola teaches the network transmitting an indication to start the D2D connection that is independent of the configuration information. For instance, paragraph [0036] describes the "eNB send[ing] a communications node change <u>command</u> to the mobile terminals . . . to <u>trigger</u> the mobile terminals to transition to a D2D communications session." (emphasis added). As in Yu, paragraphs [0042]-[0043] make clear that the D2D security key combination is merely included alongside the command change command, and itself does not serve as an indication to establish a D2D connection.

Therefore, amended claims 1, 11, and 16 are not obvious over Yu in view of Pirzada, and further in view of Hakola, and the Applicant believes these claims are allowable over all cited references of record.

Claims 2, 8-10, 12, 14-15, 17, 19, and 20 are ultimately dependent on one of claims 1, 11 and 16, which the Applicant believes are patentable as set forth above. As claims 2, 8-10, 12, 14-15, 17, 19, and 20 each depend from an allowable claim, Applicant respectfully submits that claims 2, 8-10, 12, 14-15, 17, 19, and 20 are similarly allowable.

Based on the arguments presented above, withdrawal of the 35 U.S.C. 103 rejections is respectfully requested.

Conclusion

If the Examiner believes that any additional minor formal matters need to be addressed in order to place this application in condition for allowance, or that a telephonic interview will help to materially advance the prosecution of this application, the Examiner is invited to contact the undersigned by telephone at the Examiner's convenience.

In view of the foregoing, Applicant respectfully submits that the present application, including claims 1, 2, 8-12, 14-17, 19 and 20, is in condition for allowance and a notice to that effect is respectfully requested.

Respectfully submitted,

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