

**REMARKS**

After the foregoing Amendment, Claims 1, 3 – 6, 8 – 9, 11 – 31 and 33 are currently pending in this application. Claims 2, 7, 10 and 32 have been canceled without prejudice. Claims 1, 11 and 30 were amended. New claim 33 was added.

**Claim Rejections - 35 USC § 112**

The Action rejects claim 30 under 35 U.S.C. § 112, second paragraph. In view of the foregoing Amendment, withdrawal of the rejection is respectfully requested.

**Claim Rejections - 35 USC § 102**

The Action rejects claims 1, 3 – 6, and 8 – 31 under 35 U.S.C. § 102(a) as being anticipated by Zruya.

Zruya discloses data processing that is done in two stages i.e. a pixels processing stage and a logic processing stage (col. 9 line 62 to col. 10 line 54 and col. 11 lines 1 to 63).

In the pixels processing stage, the pixels processing detects either moving objects or static objects. After a mathematical process is done, and one or more suspected dangerous objects are detected, a three-dimension (3-D) like data on the suspected object is calculated by system 10 in Zruya. The 3-D like data represents

further parameters regarding the suspected object. The 3-D data is used for detecting pixels that may represent objects such as, a relatively small or distant dangerous body, a part of a larger or closer dangerous body in a photo, etc.

In addition to the above mathematical calculation method, whenever there are suspected dangerous objects on the ground, the system 10 finds their location by comparing the photo of the suspected object with the previous stored image of that specific area. According to the calculated difference between those photos at the region of the suspected object, the system 10 will determine if the suspected object is a dangerous object, or not. In addition, objects which will disappear or will not have a logical path, are rejected as false alarms.

In the logic processing stage, the detected pixels that may represent a dangerous object (i.e., the suspected objects) are measured by using different parameters, in order to decide whether they are dangerous or not. The measured parameters are compared to a predetermined table of values that corresponds to the measured parameters.

In more detail, Zruya discloses that detection of a moving object involves photos taken from a current sequence, an average photo that was generated from a previous stored sequence of photos, a comparison sequence of photos that is generated from the difference in the pixels between the average photo and each

photo from the current sequence of photos and a generated logic matrix that contains suspected pixels (col. 11 lines 1 to 63).

Further, Zruya discloses that detection of a static object involves an average photo created from a current sequence of photos and a derivative matrix that is generated from the average photo (col.11 lines 1 to 63). The derivative matrix is used to emphasize relatively small objects in the photo, which might be potential dangerous objects. The derivative eliminates relatively large surfaces from the photo, such as shadows, fog, etc. The generated derivative matrix is stored in a photo database and compared with a previous derivative matrix, stored in a database. From the comparison, an error photo is generated.

Clearly, Zruya does not disclose at least the feature “a seasonal marking map generated for a particular season or weather condition” as recited in currently amended claim 1. The only mention of season in Zruya relates to the seasonal migration of birds, which is totally unrelated to the context of claim 1. Further, Zruya does not disclose “wherein the image processing system is configured to detect motion in the images captured, subject the images devoid of motion to background learning, and generate a composite background edge map during background learning,” as recited by claim 1.

In addition, Zruya does not disclose a composite map “comprising an adaptive background edge map, a previously learned and saved day or night background

edge map, and a seasonal marking map generated for a particular season or weather condition,” as recited in claim 1. It is appreciated that even if the comparison sequence of photos, the generated logic matrix and the derivative matrix or the error photo were deemed to resemble the adaptive background edge map or the previously learned and saved day or night background edge map as claimed in claim 1, there is still no disclosure of the seasonal marking map in Zruya much less further disclose generating a composite map comprising all three different maps as recited in claim 1.

Furthermore, it does not appear that any one of the cited prior art discloses at least the features “wherein the image processing system is configured to detect motion in the images captured, subject the images devoid of motion to background learning, and generate a composite background edge map during background learning, the composite background edge map comprising an adaptive background edge map, a previously learned and saved day or night background edge map, and a seasonal marking map generated for a particular season or weather condition” as claimed in amended claim 1. As such, it would not have been obvious for a person of ordinary skill in the relevant art to arrive at amended claim 1, and the claims depending therefrom in view of all the cited art individually or in combination.

Claim 1 is patentable over the references of record. Claims 3 – 6, 8 – 9, 11 – 31 and 33 depend from claim 1 and are patentable for at least the same reasons.

**Applicant:** Khien Meow David Chew  
**Application No.:** 12/674,966

Applicants request withdrawal of the § 102 rejection.

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**Conclusion**

If the Examiner believes that any additional matters need to be addressed in order to place this application in condition for allowance, or that a telephone interview will help to 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 Amendment and remarks, Applicants respectfully submit that the present application, including claims 1, 3 – 6, 8 – 9, 11 – 31 and 33, is in condition for allowance and a notice to that effect is respectfully requested.

Respectfully submitted,

Khien Meow David Chew

By /Jessica N. Morton/  
Jessica N. Morton  
Registration No. 71,821

Volpe and Koenig, P.C.  
United Plaza  
30 South 17th Street  
Philadelphia, PA 19103-4009  
Telephone: (215) 568-6400  
Facsimile: (215) 568-6499

JNM/dmp  
Enclosures