Wed 3/28/2018 7:50PM

From: Phillip Vales

Website: [www.patentceo.com](http://www.patentceo.com/)

To whom it may concern:

In response to the January 29, 2018, request for (0651-0027 Recording Assignments) comments regarding: Agency Information Collection Activities: Proposals, Submissions, and Approvals; my comments follow:

a) Whether the proposed collection of information is necessary for the proper performance of the functions of the agency, including whether the information shall have practical utility;

A patent assignment is an extremely valuable tool to determine the current ownership of intellectual property; thus, there is no question that the information that you are collecting is necessary.  However, as time goes on, the patent may change hands several times and as a consequence the data on file may be inaccurate.  The patent office should have mandatory registry of patent ownership to assist patent owners across the USA in determining who owns what whether for litigation purposes of for investment purposes.  This should be provided as a free service at the time of each maintenance fee and between maintenance periods at each property sale for a small fee.

b) The accuracy of the agency's estimate of the burden (including hours and cost) of the proposed collection of information, including the validity of the methodology and assumptions used;

It seems that you are overestimating the time required to fill out the cited forms.  They easily could be completed in 15 minutes or less if you are diligent and organized.

c) Ways to enhance the quality, utility and clarity of the information to be collected;

Part of the process should be in ensuring that each document is notarized at a court house with at least two pieces of identification including a photo ID preferably a passport and or photo ID or similar documentation.

d) Ways to minimize the burden of the collection of information on respondents, e.g., the use of automated collection techniques or other forms of information technology.

The electronic forms that you have now both the PDF provided forms and the electronic EPAS and ETAS systems appear to be doing their job well.  Payment by credit card, debit card or electronic funds account should be sufficient to identify the particular individual making the recordation for security purposes.

Sincerely,

Phillip Vales

Reg. Patent Agent  ::  Website: [www.patentceo.com](http://www.patentceo.com/)

PH: 305.517.1277 | FAX: 1.877.772.8236 | Email: pvales@patentceo.com

2525 Ponce De Leon Blvd Suite 300, Coral Gables, FL 33134