



**COMMENTS OF THE INTERNATIONAL TRADEMARK ASSOCIATION'S  
 USPTO SUBCOMMITTEE ON THE USPTO'S NOTICE OF  
 PROPOSED RULEMAKING DATED FEBRUARY 29, 2008**

The USPTO Subcommittee hereby responds on behalf of the International Trademark Association ("INTA") to the United States Patent and Trademark Office's ("USPTO") February 29, 2008 Notice of Proposed Rulemaking entitled "Changes in Rules Regarding Filing Trademark Correspondence by Express Mail or Under a Certificate of Mailing or Transmission."

**A. The Proposal**

The USPTO proposes that the express mail and certificate of mailing or transmission procedures no longer apply to documents for which specific Trademark Electronic Application Systems ("TEAS") forms are available. Specifically, the USPTO proposes to amend the Trademark Rules of Practice to provide that certificate of mailing or transmission procedures and/or express mail no longer apply to the following forms set forth in the chart below for clarity and ease in reading:

FORM	PROPOSED EXCLUSION FROM EXPRESS MAIL	PROPOSED EXCLUSION FROM CERTIFICATE OF MAILING/TRANSMISSION
(1) preliminary amendments	Yes	Yes
(2) office action responses	Yes	Yes
(3) requests for reconsideration after final action	Yes	Yes
(4) responses to suspension inquiries or letters of suspension	Yes	Yes
(5) petitions to revive abandoned applications under 37 C.F.R. 2.66	Yes	Yes
(6) requests for express abandonment	Yes	Yes
(7) section 15 declarations/affidavits	Yes	Yes