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Changes to Trademark Rules of Practice to Mandate Electronic Filing

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Changes to the Trademark Rules of Practice To Mandate Electronic Filing

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Comment-Anonymous

Submitter Information

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General Comment

Under Rulemaking requirements section B. Regulatory Flexibility Act subsection, it is stated that 97% of current filing is completed already electronically, and by eliminating the paper filing option, there would be no economic burden for entities choosing paper files. However, the same paragraph also mentions that additional electronic filing waiver is needed for the entities would like to pursue paper file. A more detailed economic analysis could be beneficial to understand how the indirect raising cost of paper filing could impact the demographics which still choose or is restricted to the paper filing option. The computer literacy requirement and access to the Internet may put the additional burden on the demographics who would like to protect their intellectual property but may not have the right conditions to do so. In summary, it is recommended that the proposed rule include economic impacts on the entities who still choose paper filing option and also provide means to reduce economic burden for the group rather than impose additional costs.