**International Trademark Association Comments in Response to:**

**Notice of Proposed Rulemaking Regarding Changes in Requirements for Affidavits or Declarations of Use, Continued Use, or Excusable Nonuse in Trademark Cases**

PTO-T-2016-0002 – Federal Register Vol. 81, No. 120 on June 22, 2016

The International Trademark Association (INTA) appreciates the opportunity to provide comments in response to the United States Patent and Trademark Office (USPTO) proposed rule concerning changes in Requirements for Affidavits or Declarations of Use, Continued Use, or Excusable Nonuse in Trademark Cases. The USPTO Subcommittee of INTA’s Trademark Office Practices Committee has reviewed the proposed rule and offers the following comments:

**Comments**

INTA commends the USPTO for looking for new ways to improve the integrity of the Register and to ensure that trademark registrations accurately reflect the continued use of marks with all of the goods and services identified therein. The proposed rule is a positive step toward achieving this goal and appropriately addresses concerns expressed by the both the USPTO and stakeholders regarding overly broad identifications of goods and services.

While INTA supports the proposed rule, INTA would ask that the USPTO have further discussions with stakeholder groups prior to the implementation of additional procedures and requirements designed to ensure the integrity of the Register.

INTA looks forward to discussing this important proposal further with the USPTO and invites the USPTO to contact Deborah Cohn, Senior Director of Government Relations, at [dcohn@inta.org](mailto:dcohn@inta.org) with any questions about this submission.