

# PUBLIC SUBMISSION

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Changes to Trademark Rules of Practice to Mandate Electronic Filing

**Comment On:** PTO-T-2017-0004-0001

Changes to the Trademark Rules of Practice To Mandate Electronic Filing

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Comment - Perkins

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## General Comment

I have used electronic filing with TEAS RF for years, and prefer it. Having said that, I don't think that applicants should be forced to use TEAS.

There should always be a paper option, for those citizens who do not have ready access to an up-to-date computer, high-speed Internet or familiarity with TEAS. One needs all of these things to complete an electronic filing. And, before TEAS is made mandatory, it needs an overhaul.

Frankly, TEAS is a mess, and it has gotten worse over the years. Instead of a readily understandable form that is easy to fill out and submit, the USPTO has attempted to cram into it a detailed online tutorial on how to prepare and file a trademark application, giving gratuitous, screen-filling "guidance" along the way. The result is a dizzying array of multicolor check boxes, warning statements, filing bases and excursions to different screens for things such as

drawings and specimens. Does a lay person have a reasonable chance to navigate this swamp in an hour, at which point TEAS times out? Hahahaha!

It would be better if you permitted the applicant to make out his or her own application on paper, print it to .pdf form, and file it -- as happens on the patent side of the USPTO. Once the Trademark operation gets the application, a human should examine it and respond. Stop the uncritical worship of the God of Automation -- have pity on us poor humans who have to interact with your filing systems.