

From: [Jon Jekel](#)
To: [TM FR Notices](#)
Subject: PTO-T-2018-0021 || Comment RE: Proposal to require foreign-domiciled trademark applicants and registrants to use a U.S.-licensed attorney
Date: Monday, February 25, 2019 12:33:35 PM

To Whom It May Concern:

I fully endorse this proposed rule change. About two years ago, I surveyed USPTO filing data related to certain applications filed by persons or entities domiciled in China for a potential speaking engagement topic. What I found was that large numbers of these applications were being rejected, often on procedural grounds, and no Office Action response was ever filed. The applications were abandoned, which is not only a disservice to the applicants (provided, of course, they had a bona fide intention to use the mark in the U.S. in the first place), but also, a drag on USPTO resources.

In addition, I noticed that a large number of these applications were filed by individuals who purported to be attorneys in the United States, but in fact, did not exist (e.g., the persons known as Tony Tune and Ivy Xu). Requiring further declarations regarding licensure status should reduce the volume of such abuses.

Therefore, in light of the issues outlined above, I write to endorse the proposed rulemaking.

Please let me know if you have any questions.

Sincerely,
Jon

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