

# PUBLIC SUBMISSION

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**Docket:** PTO-T-2018-0021

Requirement of U.S. Licensed Attorney for Trademark Applicants and Registrants Not Domiciled in the United States

**Comment On:** PTO-T-2018-0021-0001

Requirement of U.S. Licensed Attorney for Foreign Trademark Applicants and Registrants

**Document:** PTO-T-2018-0021-0022

Comment-Lasky

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## General Comment

This rule change is very urgently needed.

My clients have been beset by unauthorized foreign trademark filers submitting applications from trademark filing mills in Chin, based on false allegations of use and authority to file.

These filers are not bound by US law or legal ethics. They can easily file false trademark declarations or claim to be US admitted attorneys by merely clicking the appropriate box on the online form.

The consequences to legitimate trademark owners are great and the costs to expunge these false filing are very large. For the foreign filing mill, there are no consequences at all.

Without this rule, the USPTO is largely powerless to do anything to prevent these false filers from using the US Trademark register like a wild west internet domain registry.

In the past when such unauthorized filings from China or elsewhere, were identified, the USPTO OED had no idea of what to do about it and left it to others to file expensive cancellations and oppositions, assuming the time to do so had not expired.

This change is long overdue.