

From: [Nora A. Preece](#)
To: [TM FR Notices](#)
Subject: Comment Re: PTO-T-2018-0021
Date: Thursday, March 07, 2019 4:26:11 PM

Dear Commissioner for Trademarks:

I strongly support the proposed change to require that foreign-domiciled filers be represented by U.S. counsel.

U.S. trademark practitioners long accustomed to the one-way street of paying foreign firms to handle our clients' international registrations may at last enjoy some professional parity. More importantly, the proposed change will help protect the integrity and relative efficiency of our trademark system, which relies on the presumption that most filings are made in good faith, and will not create mountains of additional work for examiners (that would eventually require raising trademark filing fees).

The problem of fabricated SOU specimens, falsified declarations, overbroad goods descriptions, parties who are not who they say they are, and other irregularities more commonly found in the filings of those uninterested in following our trademark rules subverts the goal of the Lanham Act at virtually no risk to a bad faith foreign filer. Without the proposed change, the field will continue to become cluttered with fraudulent registrations that are not in commercial use but which a legitimate user would have to spend thousands of dollars invalidating through cancellation. By now, most trademark lawyers--especially those of us familiar with reverse image searching--have encountered these digitally-doctored specimens or have had to explain the expensive obstacles that a registration secured by one presents to a frustrated client. While ethical foreign filers will not welcome the additional expense of a U.S attorney, the costs created by misuse of our existing system is borne by all good faith trademark users regardless of where they live or whether or not they are represented.

Sincerely,

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