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June 29, 2016

**Via email to [TMFRNotices@uspto.gov](mailto:TMFRNotices@uspto.gov)**

Ms. Jennifer Chicoski

Office of the Deputy Commissioner for Trademark Examination Policy

United States Patent and Trademark Office

P.O. Box 1451

Alexandria, VA 22313-1451

Re: Comments on Proposed Trademark Fee Adjustment

Dear Ms. Chicoski:

I write on behalf of the American Bar Association Section of Intellectual Property Law (“ABA- IPL Section” or “Section”) in response to the United States Patent and Trademark Office’s invitation for written comments on the *Trademark Fee Adjustment*, 81 Fed. Reg. 103 (PTO-T-2016-0005, May 27, 2016).

The American Bar Association is the largest voluntary professional association in the world and the ABA-IPL Section is the largest intellectual property law association with approximately 20,000 members. The views expressed in this letter are those of the Section. These comments have not been approved by the ABA House of Delegates or Board of Governors and should not be considered as views of the American Bar Association.

The Section supports the Office’s goal of incentivizing the use of electronic filings for the reasons stated by the Office, *i.e.*, expediting processing, shortening pendency, minimizing manual processing and increasing efficiency for the filer and the Office. The Section therefore supports the proposed fee increases on certain paper filings.

The Section commends the Office for certain changes to the initial fee proposal (80 Fed. Reg. 202 (PTO-T-2015-0066, Oct. 20, 2015)). In particular, the Section supports the Office’s decision to maintain fees for electronically filed requests to divide and requests for extensions of time to file statements of use at their current levels.

The Section notes the per-class fee for an initial application filed using the regular TEAS option would increase from \$325 to \$400, and generally supports the increase to align the fees with the per-unit cost associated with such applications (*i.e.*, FY 2015 per-unit cost of \$473). The Section supports the Office's maintenance of the per-class fee for an initial application using the TEAS-RF or TEAS Plus option at the current level.

The ABA-IPL Section commends the Office for its consideration of these issues and appreciates the opportunity to offer these comments.

Very truly yours,

A handwritten signature in blue ink, appearing to read "Theodore H. Davis, Jr.", written in a cursive style.

Theodore H. Davis, Jr.  
Section Chair  
American Bar Association  
Section of Intellectual Property Law