

From: Michelle King
Sent: Thursday, September 25, 2008 5:38 PM
To: ac27.comments
Cc: Michelle King
Subject: INTA USPTO Subcommittee Comments on August 6 2008 Proposed Rule

Dear Mr. Tamayo,
Attached to this email are the International Trademark Association's (INTA) comments on the August 6, 2008 Proposed Rule entitled "Changes to Practice for Documents Submitted to the United States Patent and Trademark Office." Please confirm receipt of this email.

Thank you.
Sincerely,
Michelle Sara King

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**COMMENTS OF THE INTERNATIONAL TRADEMARK ASSOCIATION'S USPTO
SUBCOMMITTEE ON THE NOTICE OF PROPOSED RULEMAKING PUBLISHED IN THE
FEDERAL REGISTER ON AUGUST 6, 2008**

The USPTO Subcommittee hereby responds on behalf of the International Trademark Association ("INTA") to the United States Patent and Trademark Office's ("USPTO's or the Office's") Notice of Proposed Rulemaking entitled "Changes to Practice for Documents Submitted to the United States Patent and Trademark Office," published in the *Federal Register* on August 6, 2008.

A. The Proposal

The USPTO proposes to limit the type of correspondence that may be submitted to the Office via facsimile. Specifically, for trademarks the proposed change would eliminate facsimile filings with the Assignment Division due to the availability of electronic filing.

B. The Background

Since correspondence at the Office has increased significantly and this trend will likely continue, the Office has determined that limiting paper submissions via facsimile comports with its "best practices" efforts to improve the efficiency and accuracy of the Office's document processing.

C. INTA's Position

INTA generally agrees with the proposed rule as its ultimate purpose is to continue to eliminate inefficiencies and inaccuracies at the Office and to encourage the use of its electronic filing systems, whenever practicable. However, INTA requests that the USPTO revise the language to specify that PDF is an acceptable format for electronic assignment submissions.

D. Recommendations

INTA recommends the following revision to §3.25(c):

"...all documents must be submitted as digitized images in Tagged Image File (TIFF) **or PDF format or another form prescribed by the Director...**"

The above-proposed language would be in lieu of the following:

“...all documents must be submitted as digitized images in Tagged Image File Format (TIFF) or another form as prescribed by the Director...”

E. Conclusion

INTA's USPTO Subcommittee appreciates the opportunity to submit its comments on the proposed rule change and looks forward to participating in any further discussions on this issue. Should the USPTO have any questions or comments concerning INTA's response, please contact Michelle Sara King at mking@inta.org or 202-223-0989.