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The requirement of 37 C.F.R. § 1.16(u), a \$400 surcharge for filing a patent application in PDF form rather than DOCX, creates unwarranted burden on the public, and should not be approved. The PTO claims that its cost savings are \$3.15 per application. The consensus estimate among the attorneys I have polled is that the costs of pre-filing error correction, post-filing error correction, loss of patent validity, and increase in malpractice costs will be much greater than \$400 per patent application filed. Several of us have asked our malpractice carriers about the error risk that the PTO proposes to impose, and they have advised that they will likely not be able to cover claims that arise from filing patent applications in DOCX form. Seventy-three lawyers joined on a letter explaining the costs, https://www.uspto.gov/sites/default/files/documents/Comment_Seventy_Three_Patent_Practitioners_092719.pdf The PTO's "response to comments" in the Federal Register did not genuinely respond. Instead, the PTO rephrased the comments to avoid recognizing the burden created, and to avoid accurately accounting for them to OMB.