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The proposal to require submission of patent applications in DOCX format would impose an expensive and heavy burden on patent applicants.

The translation from DOCX to PDF is not always correct, especially equations and tables, and non-English characters can get incorrectly formatted. This is especially acute if the DOCX was not prepared with the Microsoft Word proprietary software from Microsoft. Not only that, there have been examples of uploaded DOCX format documents coming out as blank sheets in conversion.

As an attorney, I would need to do a word-for-word comparison between the DOCX uploaded and the resultant document, to ensure nothing has changed. And even if we did so, it's possible that the document gets mangled by the USPTO. This can be seen in the upload of Figures, where the quality of the image uploaded (and visible when reviewing a submission) is NOT the same as the quality which is entered into the file wrapper.

In light of this, it would be malpractice for us to submit something in DOCX format, and risk that the client lose rights due to a translation error. Forcing applicants to pay \$400 for the privilege of not committing malpractice is not reasonable.

Comments providing examples were previously provided to the USPTO on multiple occasions.
<https://blog.oppedahl.com/?cat=18>

We also provided a proposed solution: enable submission of a PDF and a DOCX formatted document, with the PDF controlling if there is a discrepancy. This provides the benefit of a DOCX document to the Examiner, while eliminating the significant risk to the applicant due to the format conversion.

Without this option, this change in policy would place an EXPENSIVE BURDEN on all applicants, including small entities, in direct contradiction to the PTO's certification that "It reduces burden on small entities." (See Item (c)).