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The PTO is seeking to change its rules to force patent applicants and practitioners to file using the Microsoft DOCX format. The PTO seeks to impose this burden by taxing us to continue using the process that we are accustomed too and we know works, i.e., the PTO wants to start charging us \$400 to file in .pdf format. This is pure self-centered nonsense and should be rejected. This is just another example of the PTO violating the time-honored rule of "if it ain't broke, don't fix it." The PTO has a habit of not being able to leave well enough alone. Instead, the PTO, without listening to smart patent practitioners, decides to "fix" things that are not broken, and in so doing makes matters worse.

Instead of helping, making this change will impose additional burden on patent practitioners because of problems with the DOCX format and the PTO systems. Unlike with a .pdf file, the problem that arises here is that there is no uniform, reproducible way to render a DOCX into a final document. Different computers do different things to a DOCX file. The PTO proposes that applicants will file a DOCX patent application, and the PTO will convert the DOCX to PDF on their computers. But there's no way that the PTO can guarantee that the PDF they generate on their computer will look anything like the PDF we generate on our computers. The likelihood of error in filing of patent applications in DOCX is unacceptably high.

Please reject this rule change. It will make matters worse, not better.

On a broader scale, here's my suggestion to you: enlist a core group of seasoned patent practitioners, ask them what needs to be fixed, and let them tell you how it should be fixed. It makes no sense for people within the PTO who do not use the PTO systems to file patent applications on a daily basis to think they have the background and experience to know what needs to be fixed and how it should be fixed.

If you'd like my list, give me a call or shoot me an email and I will give you a list of four patent practitioners (not me because I'm not as seasoned. smart and/or experienced as they are) who you should invite to the PTO offices to sit in a meeting(s) with the PTO personnel who are causing so much chaos with their unnecessary "fixes," and instruct the PTO personnel that they are not allowed to make any fixes without getting a consensus from this group that the fix should be done and how it should be done.

Thank you!

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