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I am opposed to the required change to PTO rules to require the use of DOCX format files for filing patent applications in place of the PDF format which is already in use and has been used successfully for many years. The \$400 surcharge proposed to be imposed is outweighed by the cost in time of having an attorney review the PTO-generated PDF from the DOCX filing. A proper review of a single filed application of approximately 100 pages would require on the order of at least 2 hours to ensure that the PDF generated by the PTO matches the original document as-filed. At a lower-level patent attorney/agent hourly rate of \$300 per hour, this results in an additional \$600 for such a review being needlessly placed on applicants.

Others have commented on the lack of a certification/guarantee from the PTO that the PTO generated PDF from the DOCX submission will match the user-generated PDF from the same DOCX submission. I agree that this is troubling and extremely problematic when we are talking about inventor's submissions which are the lifeblood of our economy.

A middle ground approach would allow applicants to file a PDF along with a DOCX version of the application file and further allow applicants to rely on the applicant-supplied PDF as the official filing document.

This appears to be a solution in search of a problem which no-one has identified with the current system.