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I am an attorney in Oklahoma regularly working to prosecute trademark applications on behalf of my clients. In 2019 the Trademark Office issued guidance that requires disclosure of a trademark applicant's "domicile address." For many of my clients, this means putting personal address information into the public record. Gathering of information, and updating existing files, are substantial burden. Additionally, for trademark owners that are individuals, disclosure of personal information places them at personal risk.

This required collection of information was promulgated either as guidance with no regulatory support, or dropped into a final rule with no notice and comment. The PTO never asked the four questions required by 44 U.S.C. § 3506(c)(2)(A) and 5 C.F.R. § 1320.8(d)(1) to allow the public to offer alternative means to the Trademark Office's end, nor to correct the Trademark Office's misestimate of burden. A petition for rulemaking that estimates burden at \$50 million was filed over a year ago; the Trademark Office has taken no action.

Additionally, collection of this information is not "necessary;" the trademark system has worked without these information for a century. The information lacks "practical utility"—the Office uses it in only a tiny minority of cases. Both increase the burden on me as a solo practitioner and particularly on my small entity clients. The Office gave no apparent consideration to "nature and extent of confidentiality"—email lists among trademark attorneys have noted scams that seem to be driven by the Office's mishandling of this information. Implementation is inconsistent with current reporting and recordkeeping—this information was not required in the past, and the PTO's forms and IT infrastructure were not restructured to make this easy. The Trademark Office does not "make appropriate use of information technology" to reduce burden.

Please disapprove collection of this information.