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The requirement of proposed 37 C.F.R. § 1.16(u) to impose 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 USPTO claims that its cost savings are \$3.15 per application. As a registered patent attorney for over 40 years, I have no doubt that the costs of pre-filing error correction, post-filing error correction, potential of patent invalidity, and potential malpractice liability, will be much greater than \$400 per patent application filed. Indeed, I am informed from my discussions with others in my profession that their malpractice carriers will not likely cover claims arising from errors resulting from the filing of applications in docx format. In discussing this issue with other patent practitioners, I am convinced that my views are representative of the vast majority of my colleagues. In short, this proposed new rule for docx filing will leave the practitioner with no choice but to pay the fee to avoid undue risk, either to the practitioner or to the applicant (probably both). Whether or not this \$400 fee can be passed on to the applicant in any particular case, it will impose a cost on the PTO "customers" that is far disproportionate to any supposed benefit to the PTO.