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37 C.F.R. § 1.16(u), which is to go into effect in January 2022, will impose a \$400 surcharge for electronically filing a patent application in any form other than the USPTO's soon-to-be preferred form for filing applications electronically -- i.e., Microsoft Word DOCX. The currently preferred form for filing applications electronically is PDF. Once 37 C.F.R. § 1.16(u) goes into effect, the USPTO will impose the \$400 penalty for any filing that is not in DOCX, including the currently preferred PDF. I do not utilize Microsoft Word and have not ever used this word processing software in over 30 years of working. I do not want to try to learn Microsoft Word as I have been using Wordperfect since forever. I do not want to pay for a copy of Microsoft Word and do not want to learn how to use it.

Notably, according to the USPTO's proposal, patent applications filed in DOCX will still be converted by the USPTO to PDF. So, the USPTO is proposing to penalize applicants for electronically filing applications in a form that is not only the currently preferred form, but also the form the USPTO will ultimately convert the applications into. It is hard to see the change in document filing preference with its penalty for noncompliance as anything more than a bare attempt to generate more fees. This makes no sense to me.

Further, the likelihood of the introduction of error during this conversion process is very high. Every computer does something different with a DOCX. There's no way that the USPTO can guarantee that the PDF they generate will look anything like the PDF applicants generate on their own computers. The converted documents will have to be carefully checked to ensure that no errors have been introduced during the conversion process. This will create immense unwarranted burden on myself and/or clients in checking to see the document that was submitted in DOCX and converted to PDF has no errors. Then there will be a burden on my self and clients in getting any errors found corrected. I do not relish this process. Wouldn't it be easier to just allow applicant's to submit the documents in PDF in the first place?? Let's make common sense common please.

For the foregoing reasons, the USPTO's DOCX proposal should be disapproved after a reasoned discussion considering applicant's needs and logic.