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Two new requirements for the collection of information should be disapproved. Although the public estimates the burden at \$50 million, the Trademark Office's filing at OMB does not disclose this new burden, does not book it in the estimates, and does not offer any disagreement with the public's burden estimate. The Office offers no objective support for its estimate of zero.

First, in 2019, the Trademark Office issued a guidance that requires disclosure of a trademark applicant's "domicile address." In many cases, this means putting a client's personal address information into the public record, which many clients do not want to do for various personal reasons, including not wanting to alert potential hostile parties to their physical locations. At the same time, collecting this information and updating existing records places a major burden on trademark attorneys, especially those, like me, who are solo practitioners. The collection of this information serves no purpose and adds personal risk with no administrative justification.

Second, also in 2019, the Trademark Office promulgated a final rule that requires disclosure of attorney bar information. Supposedly this was done to deter foreign attorneys from filing frivolous applications. But the Office didn't update its forms and filing practices or information technology to make this simple. Compliance requires attorneys and their paralegals to go through ridiculously burdensome steps in order to comply. (And the requirement has utterly failed in its purpose, since the foreign attorneys are simply finding U.S. attorneys to help them, or, in some cases, they are managing to substitute their own information for those of applicants' and registrants' duly appointed attorneys.)

In both cases, the Trademark Office evaded the public comment requirements of the Administrative Procedure Act and under the Paperwork Reduction Act. Instead, both requirements for the collection of information were promulgated either as guidances 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 and/or to correct the Trademark Office's misestimate of the consequent burden. A petition for rulemaking that estimates burden at \$50 million was filed over a year ago, but the Trademark Office has taken no action. The Office's disregard for the applicable law is shocking.

This collection of this information is in no way "necessary." For over 100 years, the trademark registration system has worked just fine without these two bits of information. There is also no plausible argument that the information has any "practical utility": the Office uses it in only a tiny minority of cases. So, there is no discernible advantage to requiring it. On the other hand, both of these new information collection requirements impose new and unreasonable burdens on individuals and small entity applicants and law firms. The Office gave no apparent consideration to the "nature and extent of confidentiality." Every day, we see new scams that seem to be driven by the Office's mishandling of this information, which results in the information's being available to those who want to use it for their own ends, including trying to steal clients from their existing trademark attorneys by trying to scare clients into believin