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Please disapprove the continued collection of personal mailing address information that is not needed to further your goals. The public estimates 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. Thus, OMB's blanket unsupported assertion must be discredited and should be ignored.

The 2019 Trademark Office guidance that requires disclosure of a trademark applicant's "domicile address" means for many trademark owners that they must publicly share their personal address information. Nowadays with doxing and other privacy violations, disclosure of personal information places them at personal risk. Having been a victim of a stalking crime in the past twenty years, I do not use my personal address for anything, and as a brand owner, I am not comfortable listing my home address in my TM application.

The Trademark Office evaded the public comment requirements of the Administrative Procedure Act and under the Paperwork Reduction Act in promulgation of this rule. Instead, the rule 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.

Several of the Office's certifications in this ICR are false. This information is not "necessary" and places an undue burden on small entity applicants and small entity law firms. 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 the continued requirement of collection of personal mailing addresses. Thank you.