

# PUBLIC SUBMISSION

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**Docket:** PTO-P-2023-0031  
0651-New (DOCX Submission Requirements)

**Comment On:** PTO-P-2023-0031-0001  
Agency Information Collection Activities; Proposals, Submissions, and Approvals: DOCX Submission Requirements

**Document:** PTO-P-2023-0031-DRAFT-0008  
Comment by Benjamin Keim

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## General Comment

The cost-benefit ratio for the proposed DOCX Submission Requirements is disproportionate. The USPTO estimates a cost of about \$3 to convert a PDF file to text. The cost for me to proofread a DOCX patent specification after conversion by the USPTO systems would be about \$300 - \$400. Thus, the cost is at least 100 times greater than the alleged benefit.

The proposed DOCX Submission Requirements are not necessary for performance of functions of the agency. I already submit patent applications in a form that includes readable text in the PDF documents. The USPTO systems remove the text and convert the PDF files to images. Thus, the problem allegedly addressed by the proposed DOCX Submission Requirements is one of the USPTO's own making. The USPTO already receives readable text in PDF submissions. A new format is not necessary. There is no need to impose external costs. All that is needed is an internal change to the USPTO systems.

The proposed information collection should be denied.