

September 11, 2025

AGENCY INFORMATION COLLECTION ACTIVITIES; PROPOSALS, SUBMISSIONS, AND APPROVALS:

(b) Evaluate the accuracy of the agency's estimate of the burden of the collection of information, including the validity of the methodology and assumptions used;

Concerning the data, the estimated burden hours seem somewhat understated. Unrepresented filers are surely facing a greater burden. A significant part of this burden is the learning curve in navigating the complex platform and understanding the USPTO procedural rules.

The intricacies of procedural rules extend the whole process. It becomes more difficult whenever applicants submit poorly written claims, as these applications will often lead to multiple rejections, and ultimately force them to file for an RCE (Request for Continued Examination), which increases their costs too. Additionally, they could receive frequent requests for clarifications, objections to their drawing, and/or filing corrections due to minor technical issues. Again, this would result in making changes and sending their applications back and forth. Each time this happens, it adds extra hours that the agency doesn't include in its estimates. This creates a difference between what the agency thinks the burden will be and what people filing experience. The estimation doesn't cover the actual difficulties that unrepresented filers encounter during the application process.

Considering these concerns, I respectfully ask that the USPTO reassess its burden estimates. It would also be best to separate the respondents' categories (attorneys or solo innovators/unrepresented filers) to better demonstrate the real-time and financial costs incurred. A more correct assessment would take into account the legal and technical expertise needed, while also recognizing the immense pressure that small entities and unrepresented filers experience during the process.

Ana Juneja

Attorney

Ana Law LLC

ana@analaw.com