

June 23, 2014

The Honorable Michelle K. Lee
Deputy Under Secretary of Commerce for Intellectual Property and
Deputy Director of the United States Patent and Trademark Office
United States Patent and Trademark Office
600 Dulany Street
Alexandria, VA 22314

via email: TMFRNotices@uspto.gov

**Re: AIPLA Comments in Response to the Federal Register Notice,
“Reduction of Fees for Trademark Applications and Renewals,”
79 Fed. Reg. 26664, May 9, 2014**

Dear Deputy Under Secretary Lee:

The American Intellectual Property Law Association (AIPLA) is pleased to have the opportunity to present its views with respect to the Notice of Proposed Rulemaking entitled “Reduction of Fees for Trademark Applications and Renewals,” published in the May 9, 2014 issue of the Federal Register, 79 Fed. Reg. 26664.

AIPLA is a national bar association with approximately 15,000 members who are primarily lawyers in private and corporate practice and government service and in the academic community. AIPLA members represent a wide and diverse spectrum of individuals, companies, and institutions involved directly or indirectly in the practice of patent, trademark, copyright, and unfair competition law. Our members represent both owners and users of intellectual property.

AIPLA welcomes this opportunity to comment on the U.S. Patent and Trademark Office’s (USPTO) request for comments concerning reduction of fees for trademark applications and renewals. The Federal Register Notice proposes reducing the application filing fees for TEAS applications and TEAS Plus applications as well as TEAS renewal applications. AIPLA supports the USPTO’s attempt to pass on the savings it has achieved through increased electronic filing to its customers.

Trademark fee reductions will be financially beneficial to trademark applicants and their representatives. Even the modest fees charged now sometimes deter individuals and smaller entities from filing for registration of their trademarks with the USPTO; lowering the fees will reduce this barrier.

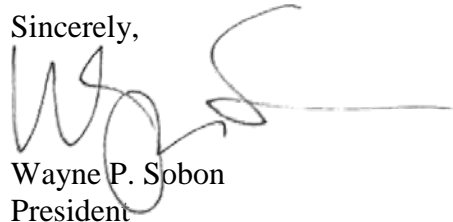
While AIPLA is in support of the proposed fee reductions, fees should not be reduced if doing so would compromise the quality and efficiency of USPTO operations. The USPTO has been hindered over the years due to unstable financial situations, such as diversion and sequestration. However, Commissioner for Trademarks Debbie Cohen's June 11, 2014 USPTO Director's Forum guest blog stated, "[T]he reduction is possible due to efficiencies that have allowed the USPTO to create an operating reserve. The proposed reduction maintains a reserve sufficient to manage operations and address long term investments." Thus, the appropriate cautions appear to be in place.

Consequently, AIPLA supports reductions in fees to the extent that the fees collected amply cover the financial needs of the USPTO and as long as the current and future efficacy and efficiency of the USPTO will not be compromised.

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AIPLA appreciates the opportunity to provide comments on this important initiative. AIPLA looks forward to further dialogues with the USPTO in finding solutions and defining programs to maintain and enhance the USPTO's mission.

Sincerely,

A handwritten signature in black ink, appearing to read 'Wayne P. Sobon', with a long horizontal line extending to the right.

Wayne P. Sobon
President

American Intellectual Property Law Association