

Ms. Sharon Alcantara
Bureau of Legal Affairs
Intellectual Property Office of the Philippines
16F IP Center, 28 Upper McKinley Road, Fort Bonifacio, Taguig City,
Manila, Philippines

Dear Ms. Alcantara,

The International Trademark Association (INTA) is a global organization of 6,700 trademark owners and professionals from over 190 countries, including 43 members in the Philippines. INTA is a not-for-profit membership association dedicated to the support and advancement of trademark and related intellectual property as elements of fair and effective commerce. Founded in 1878, INTA supports global trademark research, policy development, education and training. For more information about INTA please visit www.inta.org.

INTA greatly appreciates the sustained engagement with IPOPPL over the past years, and greatly appreciates the opportunity to submit comments on Proposed Amendments to the Implementing Rules and Regulations on *Inter Partes* Proceedings.

Under current *inter partes* regulations, the maximum deadline to file an opposition is 90 days from the time the mark being opposed is published. In the proposed revision, an additional 30 days is given on "compelling grounds".

As Philippine *inter partes* rules require authentication of notarized opposition documents (e.g., notice of opposition, affidavit of witnesses, power of attorney) before the Philippine consulate, the proposed revisions now appear to allow the submission of mere notarized documents as the "authentication may be secured after the filing of the case provided that the execution of the documents aforementioned are done prior to such filing and provided further, that the authentication must be submitted before the issuance of the order of default or conduct of the preliminary conference under Section 13 of this Rule." This will give foreign opposers more time to obtain the authentication of the required documents.

Based on our review, the proposed changes appear to be beneficial to trademark owners in general, for which we thank the Intellectual Property Office of the Philippines.

These comments were prepared by the Asia-Pacific Subcommittee of the Trademark Office Practice Committee and INTA staff. Should you have any questions or concerns, please contact Seth Hays, INTA Asia-Pacific Chief Representative at shays@inta.org or +65 6866 3206.

Sincerely,



Etienne Sanz de Acedo
Chief Executive Officer
International Trademark Association