

**International Trademark Association Comments in Response to:  
Notice of Proposed Rulemaking Regarding Reduction of Fees for  
Trademark Applications and Renewals**

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The International Trademark Association (INTA) appreciates the opportunity to provide comments in response to the notice of proposed rulemaking by the United States Patent and Trademark Office (USPTO) to reduce fees for trademark applications and renewals. The USPTO Subcommittee of INTA’s Trademark Office Practices Committee prepared the general comments below, in consultation with other relevant INTA subcommittees.

**Comments**

INTA supports the USPTO’s efforts to reduce fees where appropriate and consistent with a sustainable funding model and to encourage applicants to use electronic communications in all phases of the application process. In particular, INTA supports the USPTO’s proposal to introduce a new option, the TEAS Reduced Fee (“TEAS RF”) application, which has a lower application fee than the regular TEAS application but does not require applicants to select identifications of goods and services from the Acceptable Identifications of Goods and Services Manual (the “ID Manual”).

As some applicants may not be able to file electronically, it would be ineffective, if not unfair, to penalize such applicants with substantially higher fees. Therefore, INTA agrees with the USPTO’s decision to retain the existing fee for paper applications until the USPTO identifies the reasons why applicants continue to file paper applications and develops an electronic solution to address those circumstances. INTA encourages the USPTO to continue outreach efforts to identify and address the reasons behind paper application filings.

INTA does not oppose the proposal to lower the filing fee for TEAS Plus applications. However, based on a poll of the members of the USPTO Subcommittee of INTA’s Trademark Office Practices Committee, applicants may file by TEAS rather than TEAS Plus to avoid certain requirements of the TEAS Plus application. For this reason, INTA believes that the fee reduction for TEAS Plus applications is not likely to cause applicants to switch from TEAS to TEAS Plus. INTA encourages the USPTO to investigate and address the restrictions of TEAS Plus that currently lead some applicants to file by TEAS rather than TEAS Plus. For example, applicants may need to submit identifications of goods and services not found in the ID Manual to accurately identify their goods and services. Also, the requirement to search for and select all relevant goods/services and separately assign a basis to each, and where applicable, attach a separate specimen, makes the TEAS Plus application more time-consuming and cumbersome than regular TEAS applications. Moreover, certain types of goods and services, as well as

certain classes, are not eligible for TEAS Plus. Revisions to the ID Manual to include all classes and types of goods and services, update recitations and make it more easily navigable would help to address these concerns.

### **Conclusion**

In conclusion, INTA supports the USPTO's fee proposals, in particular the introduction of the TEAS RF application option, reduction of fees for electronic renewal applications and preservation of the current fee level for paper applications. INTA looks forward to further discussions with the USPTO regarding the additional issues raised in its comments.