

SF-83 SUPPORTING STATEMENT
UNITED STATES PATENT AND TRADEMARK OFFICE
Submissions Regarding Correspondence and Regarding
Attorney Representation (Trademarks)
OMB Control Number 0651-0056

A. JUSTIFICATION

1. Necessity of Information Collection

The United States Patent and Trademark Office (USPTO) administers the Trademark Act, 15 U.S.C. § 1051 et seq., which provides for the Federal registration of trademarks, service marks, collective trademarks and service marks, collective membership marks, and certification marks. Individuals and businesses who use their marks, or intend to use their marks in commerce may file an application with the USPTO to register their marks. Registered marks remain on the register indefinitely so long as the owner of the registration files the necessary maintenance documents (which are covered under OMB control number 0651-0055 Post Registration (Trademark)).

Such individuals and businesses may also submit various communications to the USPTO regarding their pending application or registered trademarks, such as filing additional information needed to process pending applications, amendments to the applications, or the papers necessary to keep a trademark in force. In the majority of circumstances, individuals and businesses retain attorneys to handle these matters. These parties may also submit communications to the USPTO regarding the appointment of attorneys of record or domestic representatives to represent applicants in the application process, the revocation of an attorney's or domestic representative's appointment, and requests for permission to withdraw from representation. Applicants and registrants may also submit change of owner's address forms requesting that the USPTO enter a new address for the applicant or registrant into the record of an application or registration.

The rules implementing the Trademark Act are set forth in 37 CFR Part 2. In addition to governing the registration of trademarks, the Act and rules also govern the appointments and revocations of attorneys and domestic representatives. The trademark rules provide the specifics for filing requests for permission to withdraw as the attorney of record. The requirements for changes of the owner's address are not governed by the trademark rules, but are outlined in the USPTO's procedures.

The information in this collection can be submitted to the USPTO in paper or electronically through the Trademark Electronic Application System (TEAS). There are three electronic forms in this collection; however, there are no official paper forms. Individuals and businesses can submit their own paper forms, following the USPTO's rules and guidelines to ensure that they provide all of the necessary information.

Applicants who choose to submit their applications electronically must use the TEAS forms.

Table 1 identifies the statutes and rules that permit the USPTO to collect the information needed to process these submissions.

Table 1: Information Requirements for Submissions Regarding Correspondence and Regarding Attorney Representation (Trademarks)

Requirement	Statute	Rule
Revocation of Attorney/Domestic Representative and/or Appointment of Attorney/Domestic Representative	15 U.S.C. §§ 1051(e), 1058(f), 1123, and 1141h(d)	37 CFR Part 2, 2.17, 2.19, and 2.24
Request for Permission to Withdraw as Attorney of Record	Not Applicable	37 CFR Part 2, 2.19
Change of Owner's Address Form	Not Applicable	Not Applicable

2. Needs and Uses

The USPTO uses the information described in this collection to process revocations and appointments of attorneys/domestic representatives, requests for permission to withdraw as the attorney of record, and changes of owner's addresses. The information in this collection is a matter of public record and is used by the public for a variety of private business purposes related to establishing and enforcing trademark rights. The information is available at USPTO facilities, and also can be accessed at the USPTO web site. Additionally, the USPTO provides the information to other entities, including Patent and Trademark Depository Libraries (PTDLs). The PTDLs maintain the information for use by the public.

The Information Quality Guidelines from Section 515 of Public Law 106-554, Treasury and General Government Appropriations Act for Fiscal year 2001, apply to this information collection and comply with all applicable information quality guidelines, *i.e.*, OMB and specific operating unit guidelines.

This proposed collection of information will result in information that will be collected, maintained, and used in a way consistent with all applicable OMB and USPTO Information Quality Guidelines. (See Ref. A, the *USPTO Information Quality Guidelines*.)

Table 2 lists the information identified in this collection and explains how this information is used by the public and by the USPTO:

Table 2: Needs and Uses of Information Collected for Submissions Regarding Correspondence and Regarding Attorney Representation (Trademarks)

Form and Function	Form #	Needs and Uses
Revocation of Attorney/Domestic Representative and/or Appointment of Attorney/Domestic Representative	No Form Associated	<ul style="list-style-type: none"> Used by applicants and registrants to appoint an attorney to act on their behalf in connection with single or multiple applications or registrations, and to revoke such appointments. Used by foreign applicants and registrants to designate a domestic representative upon whom to serve notices or process in legal proceedings affecting the mark. Used by the USPTO to process requests to appoint attorneys/domestic representatives and to process requests to revoke such appointments.
TEAS Revocation of Attorney/Domestic Representative and/or Appointment of Attorney/Domestic Representative (Ref. B)	PTO Form 2196	<ul style="list-style-type: none"> Used by applicants and registrants to electronically transmit appointments of attorneys to act on their behalf in connection with single or multiple applications or registrations, and to electronically transmit revocations of those appointments. Used by foreign applicants and registrants to electronically designate a domestic representative upon whom to serve notices or process in legal proceedings affecting the mark. Used by the USPTO to process electronically filed requests to appoint attorneys/domestic representatives, and to process electronically filed requests to revoke such appointments.
Request for Permission to Withdraw as Attorney of Record	No Form Associated	<ul style="list-style-type: none"> Used by attorneys to submit a request for permission to withdraw as the attorney of record. Used by the USPTO to process requests for permission to withdraw as the attorney of record.
TEAS Request for Permission to Withdraw as Attorney of Record (Ref. C)	PTO Form 2201	<ul style="list-style-type: none"> Used by attorneys to electronically submit a request for permission to withdraw as the attorney of record. Used by the USPTO to process electronically filed requests for permission to withdraw as the attorney of record.
Change of Owner's Address Form	No Form Associated	<ul style="list-style-type: none"> Used by applicants and registrants to submit a request that the USPTO amend the record of an application or registration by entering a new address for the applicant or registrant. Used by the USPTO to process requests to change the address of the applicant or registrant that is identified in the application or registration.
TEAS Change of Owner's Address (Ref. D)	PTO Form 2197	<ul style="list-style-type: none"> Used by applicants and registrants to electronically submit a request that the USPTO amend the record of an application or registration by entering a new address for the applicant or registrant. Used by the USPTO to process electronically filed requests to change the address of the applicant or registrant that is identified in the application or registration.

3. Use of Information Technology

The USPTO currently offers four IT systems in support of this collection that are accessible through the online Trademark Electronic Business Center (TEBC). The TEBC provides descriptions of the systems, and the systems feature online “help” programs. Thus, the USPTO offers the public a single source for a variety of IT systems useful both for making submissions to the USPTO and for tracking the status of these submissions.

The USPTO provides online electronic forms, including those for appointing an attorney or domestic representative, for revoking those appointments, to request permission to

withdraw as the attorney of record, and the change of owner's address, through the web-accessible Trademark Electronic Application System (TEAS). Once completed, TEAS forms are transmitted to the USPTO via the Internet. The TEAS forms include "help" instructions, as well as a "Form Wizard" that tailors the form to the particular characteristics of the application or registration in question, based on responses provided by the user to questions posed by the "Wizard." The forms filed are received within seconds after transmission, and a confirmation of filing is immediately e-mailed to the user.

Users do not affix digital signatures to the TEAS forms. Instead, these forms are signed using a combination of alphanumeric characters that the user selects and types between two forward slashes. TEAS forms can be signed in this manner, or the text form of the application can be e-mailed to a second party who can then electronically sign the application. The forms can also be signed by printing the signature page of the form, signing it in ink, scanning the signed page, and then transmitting the entire form and scanned signature page to the USPTO.

Please note that electronic forms can only be submitted via TEAS; filers may not e-mail their own forms to the USPTO. Additionally, filers who submit drawings of marks that are not "standard character" drawings must attach digitized images of these drawings to their submissions.

The USPTO maintains an online image database of the electronic trademark application or registration file wrapper entitled the Trademark Document Retrieval (TDR) system. The USPTO also maintains an online system called the Trademark Application and Registration Retrieval (TARR) system, which provides users with information regarding the status of trademark applications and registrations. The data in the TARR system is updated daily.

The USPTO provides a web-based record of registered marks, and marks for which applications for registration have been submitted, called the Trademark Electronic Search System (TESS). TESS can be used by potential applicants for trademark registration to assist in the determination of whether or not a particular mark may be available. The data in TESS is identical to the data reviewed by examining attorneys at the USPTO in their determination of whether marks for which registration is sought are confusingly similar to marks in existing registrations or to marks in pending applications for registration. TESS allows the user to choose from four different search tools, is updated daily, and is easy to use.

4. Efforts to Identify Duplication

This information is collected only when appointments of attorneys/domestic representatives, revocations of attorneys/domestic representatives, requests for permission to withdraw as the attorney of record, and change of owner's addresses are submitted to the USPTO. This collection does not solicit any data already available at the USPTO and does not create a duplication of effort.

5. Minimizing the Burden to Small Entities

The USPTO believes that the submission of the information provided places no undue burden on small businesses or other small entities. The same information is required from every customer and is not available from any other source.

6. Consequences of Less Frequent Collection

This information collection could not be conducted less frequently, since the information is collected only when voluntarily submitted by the public. If the information were not collected, applicants could not appoint attorneys/domestic representatives to represent them at the USPTO or revoke those appointments, nor could they request address changes. Likewise, their attorneys could not request permission to withdraw as the attorney of record. If this information was not collected, the USPTO could not comply with the requirements of the Trademark Act, 15 U.S.C. § 1051 and 37 CFR Part 2.

7. Special Circumstances in the Conduct of Information Collection

There are no special circumstances associated with this collection of information.

8. Consultation Outside the Agency

The 60-Day Federal Register Notice was published on April 15, 2008 (73 Fed Reg. 20257). The public comment period ended on June 16, 2008. The USPTO received one public comment in response to the Notice.

The comment, from a private individual, stated the following:

“The submission of notification as to the appointment of an attorney is necessary to prevent unauthorized practice of law. Nearly every tribunal (of which, by the definitions in 37 CFR Part 10, the USPTO is one) requires an attorney to submit notification of his or her appearance in the action. It delineates the responsibilities of the attorney to his client, i.e., not only is the attorney acting on behalf of his client for the submission of a particular paper upon which his or her name appears, but he is the client’s representative throughout the action. The attorney bears the responsibility of replying to the USPTO whether or not his or her client pays the bills.

Moreover, in addition to the information currently being required by the Trademark Office, tribunals require a bar member to state his bar number and identify the state of registry. Too often, members of the bar will allow their bar membership to expire resulting in a host of difficulties to both the attorney and the client. By having a verifiable source (bar number and state), the attorney’s qualifications could be easily checked if and when there is reason for doing so.”

The USPTO’s responded to the comment, stating that:

“The USPTO has considered requiring attorneys practicing before the Office on trademark matters to provide their bar number and state of registry. However, this

proposal would require a change in the Trademark Rules of Practice and to the Trademark Electronic Application System (TEAS). This could take a significant amount of time to implement and no rulemaking has been proposed at this time. Nonetheless, the Office is concerned about the unauthorized practice of law and will continue to strictly enforce requirements that only proper parties sign responses to Office actions and other documents. The Office will continue to review its practice and procedures in this area and appreciates your comment. As noted, Part 10 of the Trademark Rules provides a code of professional responsibility for attorneys appearing before the Office. The Office of Enrollment and Discipline is responsible for enforcing these rules.”

Large and well-organized bar associations frequently communicate their views to the USPTO. Also, the Trademark Public Advisory Committee (T-PAC) was created by the American Inventors Protection Act of 1999 to advise the Director of the USPTO on the agency’s operations, including its goals, performance, budget, and user fees. The T-PAC includes nine voting members who are appointed by and serve at the pleasure of the Secretary of Commerce. The statute also provides non-voting membership on the Committee for the agency’s three recognized unions. Members include inventors, lawyers, corporate executives, entrepreneurs, and academicians with significant experience in management, finance, science, technology, labor relations, and intellectual property issues. The members of T-PAC reflect the broad array of USPTO’s stakeholders and embrace the USPTO’s e-government initiative. This diversity of interests is an effective tool in helping the USPTO nurture and protect the intellectual property that is the underpinning of America’s strong economy.

9. Payment or Gifts to Respondents

This information collection does not involve a payment or gift to any respondent.

10. Assurance of Confidentiality

Trademark applications and registrations are open to public inspection. Confidentiality is not required in the processing of trademark applications.

Apart from the substantive components and burden statements, the TEAS forms also include a link to the USPTO’s Web Privacy Policy. The “Privacy Policy Statement” link is located above the PRA Burden Statement found at the end of the “Wizard” and at the end of the forms themselves. The Web Privacy Policy Statement explains how the USPTO handles any personal information collected from the public through the web site, and how it handles e-mails. Additionally, the statement also explains what information is collected through the USPTO’s Kid Pages, and whether and why the USPTO uses cookies to collect information.

11. Justification for Sensitive Questions

None of the required information in this collection is considered to be of a sensitive nature.

12. Estimate of Hour and Cost Burden to Respondents

Table 3 calculates the anticipated burden hours and costs of this information collection to the public, based on the following factors:

- Respondent Calculation Factors**
 The USPTO estimates that it will receive approximately 160,004 responses per year for this collection, with 142,226 of them filed electronically.
- Burden Hour Calculation Factors**
 The USPTO estimates that it takes the public approximately 3 to 15 minutes (0.05 to 0.25 hours) to complete this information, depending upon the amount and type of information requested in a particular case. This includes the time to gather the necessary information, prepare the documents, and submit the completed request to the USPTO. The time estimates shown for the electronic forms in this collection are based on the average amount of time needed to complete and electronically file the associated form.
- Cost Burden Calculation Factors**
 The professional rate of \$310 per hour used in this submission to calculate respondent cost burden is the median rate for associate attorneys in private firms as published in the 2007 report of the Committee on Economics of Legal Practice of the American Intellectual Property Law Association (AIPLA). This report summarized the results of a survey with data on hourly billing rates. This is a fully-loaded rate.

The USPTO expects that the information in this collection will primarily be prepared by attorneys, though some submissions may be prepared by *pro se* registrants.

Table 3: Burden Hour/Burden Cost to Respondents

Item	Hours (a)	Responses (yr) (b)	Burden (hrs/yr) (c) (a) x (b)	Rate (\$/hr) (d)	Total Cost (\$/hr) (e) (c) x (d)
Revocation of Attorney/Domestic Representative and/or Appointment of Attorney/Domestic Representative	0.10	13,128	1,313	\$310.00	\$407,030.00
TEAS Revocation of Attorney/Domestic Representative and/or Appointment of Attorney/Domestic Representative (PTO Form 2196)	0.08	105,023	8,402	\$310.00	\$2,604,620.00
Request for Permission to Withdraw as Attorney of Record	0.25	427	107	\$310.00	\$33,170.00
TEAS Request for Permission to Withdraw as Attorney of Record (PTO Form 2201)	0.20	3,419	684	\$310.00	\$212,040.00
Change of Owner's Address Form	0.07	4,223	296	\$310.00	\$91,760.00
TEAS Change of Owner's Address Form (PTO Form 2197)	0.05	33,784	1,689	\$310.00	\$523,590.00
Total	- - - -	160,004	12,491	- - - -	\$3,872,210.00

13. Total Annualized Cost Burden

There are postage costs for mailing the paper submissions to the USPTO associated with this information collection. This collection does not have any capital start-up, operating, maintenance, or recordkeeping costs, nor does it have filing fees.

Customers incur postage costs when submitting the non-electronic information to the USPTO by mail through the United States Postal Service. The USPTO estimates that the majority (98%) of the paper submissions are sent to the USPTO via first class mail. Out of 17,778 paper submissions, the USPTO estimates that 17,422 will be mailed, with a first class postage cost of 42 cents. Therefore, the USPTO estimates that the total postage cost for this collection is \$7,317 per year.

Table 4 calculates the postage costs for submissions regarding correspondence and regarding attorney representation (Trademarks).

Table 4: Postage Costs for Submissions Regarding Correspondence and Regarding Attorney Representation (Trademarks)

Item	Responses (yr) (a)	Postage Costs (b)	Total Cost (yr) (a) x (b)
Revocation of Attorney/Domestic Representative and/or Appointment of Attorney/Domestic Representative	12,865	\$0.42	\$5,403.00
Request for Permission to Withdraw as Attorney of Record	418	\$0.42	\$176.00
Change of Owner's Address Form	4,139	\$0.42	\$1,738.00
Total	17,422	- - - - -	\$7,317.00

The USPTO estimates that the total annualized (non-hour) cost burden for this collection is \$7,317 per year.

14. Annual Cost to the Federal Government

The revocations and appointments of attorneys/domestic representatives, the requests for permission to withdraw as the attorney of record, and the change of owner's addresses are processed by contractors for the USPTO. The USPTO estimates that it takes 5 minutes (0.08 hours) to process the revocations and appointments that are filed in paper, but only 2 minutes (0.03 hours) to process those that are filed through TEAS. Finally, the USPTO estimates that it takes 2.4 minutes (0.04 hours) to process the requests for permission to withdraw as the attorney of record and the change of owner's address forms that are filed in paper, but only 1 minute (0.02 hours) to process those that are filed through TEAS.

Revocations and appointments of attorneys/domestic representatives, requests for permission to withdraw as the attorney of record, and requests to change an owner's address are all processed by contractors retained by the USPTO. The USPTO

estimates that the hourly rate for these contractors is equivalent to the average hourly rate that would be paid to GS-4, step 4 and GS-5, step 4 employees. The current hourly rates for GS-4, step 4 and GS-5, step 4 are \$14.96 and \$16.73, respectively. Based on these rates, the USPTO estimates that the average hourly rate for contractors processing these documents is \$15.85. When 30% is added to account for a fully loaded hourly rate (benefits and overhead), the cost per hour for these contractors is \$15.85 + \$4.76, for a rate of \$20.61.

Table 6 calculates the processing hours and costs of this information collection to the Federal Government:

Table 6: Burden Hour/Burden Cost to the Federal Government

Item	Hours (a)	Responses (yr) (b)	Burden (hrs/yr) (c) (a) x (b)	Rate (\$/hr) (d)	Total Cost (\$/hr) (e) (c) x (d)
Revocation of Attorney/Domestic Representative and/or Appointment of Attorney/Domestic Representative	0.08	13,128	1,050	\$20.61	\$21,641.00
TEAS Revocation of Attorney/Domestic Representative and/or Appointment of Attorney/Domestic Representative (PTO Form 2196)	0.03	105,023	3,151	\$20.61	\$64,942.00
Request for Permission to Withdraw as Attorney of Record	0.04	427	17	\$20.61	\$350.00
TEAS Request for Permission to Withdraw as Attorney of Record (PTO Form 2201)	0.02	3,419	68	\$20.61	\$1,401.00
Change of Owner's Address Form	0.04	4,223	169	\$20.61	\$3,483.00
TEAS Change of Owner's Address Form (PTO Form 2197)	0.02	33,784	676	\$20.61	\$13,932.00
Total	- - - - -	160,004	5,131	- - - - -	\$105,749.00

15. Reason for Change in Burden

Summary of Changes Since the Previous Submission

The OMB approved this information collection on October 19, 2005, with 68,666 responses, 4,486 burden hours, and \$5,082 in annualized (non-hour) costs.

With this renewal, the USPTO estimates that the total burden and annualized (non-hour) costs for this collection will be 160,004 responses, 12,491 burden hours, and \$7,317 in annualized costs, which is an increase of 91,338 responses, 8,005 burden hours, and \$2,235 in annualized costs over the currently approved burden for this collection. The increases in the responses, burden hours, annualized (non-hour) costs are due to administrative adjustments.

Changes in Burden Estimates Since the 60-Day Federal Register Notice

In the 60-Day Federal Register Notice published on April 15, 2008, the USPTO estimated that the renewal of this collection would have a total annual respondent cost burden of \$3,797,264. This cost burden was calculated based on the expectation that associate attorneys would be most likely to complete these submissions. The USPTO estimated that the hourly rate for these attorneys would be \$304. Since the publication of the Notice, the USPTO has since discovered a newer rate of \$310, as reported in the 2007 report of the Committee on Economics of Legal Practice of the American Intellectual Property Law Association. This has increased the respondent cost burden by \$74,946, from \$3,797,264 as reported in the Notice to \$3,872,210 as estimated in the current submission.

Changes in Respondent Cost Burden

The annual respondent cost burden has increased since the last submission, due to an increased number of submissions and an increase in the hourly rate for associate attorneys. As in the last submission, the USPTO still believes that associate attorneys are most likely to complete these submissions. In the previous submission, the hourly rate for associate attorneys was \$286, as reported in the 2003 report of the Committee on Economics of Legal Practice of the American Intellectual Property Law Association. For this submission, the USPTO is using an hourly rate of \$310 as reported in the 2007 report. The USPTO estimates that the annual respondent cost burden will increase by \$2,589,214, from \$1,282,996 in the previous submission to \$3,872,210 in this submission.

Changes in Responses and Burden Hours

The USPTO estimates that the number of responses submitted annually for this collection will increase by 91,338, from 68,666 to 160,004 responses. Consequently, the USPTO estimates that the total burden hours for this collection will increase by 8,005 hours, from 4,486 to 12,491 burden hours per year. These changes are due to administrative adjustments, as follows:

- The USPTO believes that the total number of Revocation of Attorney/Domestic Representative and/or Appointment of Attorney/Domestic Representative submitted both in paper and electronically will increase during this renewal period. These USPTO estimates that the majority of these submissions will be submitted electronically through TEAS, with fewer submissions submitted in paper. The USPTO believes that the total number of submissions will increase by 103,341 responses, from 14,810 to 118,151 responses per year. As a result, the USPTO estimates that the total burden for this collection will increase by 8,471 hours, from 1,244 to 9,715 burden hours per year. **Therefore, this collection takes a burden increase of 8,471 hours as an administrative adjustment.**

- The USPTO believes that the number of Requests for Permission to Withdraw as Attorney of Record submitted in paper will decrease during this renewal period. The USPTO believes that the total number of submissions will decrease by 2 responses, from 429 to 427 responses per year. However, the USPTO does not expect that this slight reduction in the responses will result in a reduction of the burden hours. **Therefore, although the responses in this collection have decreased, the burden hours remain the same and the burden is unaffected.**
- The USPTO believes that the number of TEAS Requests for Permission to Withdraw as Attorney of Record will increase during this renewal period. The USPTO believes that the responses will increase by 1,703, from 1,716 to 3,419 responses per year. Consequently, the USPTO estimates that the burden hours for this collection will increase by 341 hours, from 343 to 684 burden hours per year. **Therefore, this collection takes a burden increase of 341 hours as an administrative adjustment.**
- The USPTO expects that fewer Change of Owner's Address Forms will be filed during this renewal period. The USPTO believes that the total number of submissions, both paper and electronic, will decrease by 13,704 responses, from 51,711 to 38,007 responses. As a result, the USPTO estimates that the total burden hours for this collection will decrease by 807 hours, from 2,792 to 1,985 burden hours per year. **Therefore, this collection takes a burden reduction of 807 burden hours as an administrative adjustment.**

The USPTO estimates that a net total of 8,005 burden hours will be added to this collection, from 4,486 to 12,491 burden hours per year. The USPTO estimates that 807 burden hours will be reduced from the collection due to administrative adjustments. However, the USPTO believes that this reduction will be offset by an increase of 8,812 burden hours, which is also due to an administrative adjustment. **In sum, this information collection has a net burden increase of 8,005 hours per year due to administrative adjustments.**

Changes in Annual (Non-Hour) Costs

For this renewal, the USPTO estimates that the annual (non-hour) costs for this collection will increase by \$2,235, from \$5,082 to \$7,317 per year. This change is due to administrative adjustments, as follows:

- The USPTO believes that the postage costs for the paper submissions of the Revocation of Attorney/Domestic Representative and/or Appointment of Attorney/Domestic Representative will increase during this renewal. The USPTO estimates that the postage costs will increase by \$4,307, from \$1,096 to \$5,403 per year. This is due to increased submissions and an increase in the postage rates from 37 to 42 cents. These increases offset reductions in the postage costs caused by changes in how the postage costs are calculated. In the previous submission, the prevailing postage cost was multiplied by the total number of

paper submissions. For this renewal, the USPTO is calculating the postage costs at 98% of the paper filings. **Therefore, this collection has an increase of \$4,307 in annual (non-hour) postage costs due to an administrative adjustment.**

- The USPTO believes that the postage costs for the paper submissions of the Requests for Permission to Withdraw as Attorney of Record will increase during this renewal period, despite decreases in the overall number of requests filed and changes in the method for calculating the postage costs. However, the USPTO does not expect these decreases to offset the increases in the postage costs due to the increase in the postage rate from 37 to 42 cents. The USPTO estimates that the postage costs will increase by \$17, from \$159 to \$176 per year. **Therefore, this collection has an increase of \$17 in annual (non-hour) postage costs due to an administrative adjustment.**
- The USPTO believes that the postage costs for the paper submissions of the Change of Owner's Address Form will decrease during this renewal period due to a reduction in the overall number of paper submissions and a change in how the postage costs are calculated. The combined reduction offsets any increases to the annual (non-hour) costs resulting from the increase in the postage rate from 37 to 42 cents. The USPTO estimates that the postage costs will decrease by \$2,089, from \$3,827 to \$1,738 per year. **Therefore, this collection has a reduction of \$2,089 in annual (non-hour) postage costs due to an administrative adjustment.**

The USPTO estimates that the annual (non-hour) costs for this collection will increase by \$2,235, from \$5,082 to \$7,317 per year. The USPTO estimates that \$2,089 will be reduced from this collection as a result of administrative adjustments. However, the USPTO believes that this reduction will be offset by an estimated increase of \$4,324 due to administrative adjustments. **In sum, this information collection has a net total increase of \$2,235 in the annual (non-hour) costs as a result of administrative adjustments.**

[Note: The previously approved estimate of \$5,082 in annual costs for this collection is listed as \$5,000 in the current inventory system. The \$82 difference is due to rounding the estimate to the nearest thousands in order to accommodate the legacy inventory system. This rounded figure was carried over when the legacy data was migrated to the current inventory system. Consequently, the annual cost burden increase of \$2,235 for this collection that is due to administrative adjustments is displayed as an increase of \$2,317 in the current inventory system in order to compensate for the previously rounded figure and to result in the new annual cost burden of \$7,317 for this collection as described above.]

16. Project Schedule

The USPTO does not intend to publish this information for statistical use.

17. Display of Expiration Date of OMB Approval

The forms in this information collection will display the OMB Control Number and the date on which OMB's approval of this information collection expires.

18. Exception to the Certificate Statement

This collection of information does not include any exceptions to the certificate statement.

B. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS

This collection of information does not employ statistical methods.

LIST OF REFERENCES

- A. USPTO Information Quality Guidelines
- B. TEAS Revocation of Attorney/Domestic Representative and/or Appointment of Attorney/Domestic Representative (PTO Form 2196)
- C. TEAS Request for Permission to Withdraw as Attorney of Record (PTO Form 2201)
- D. TEAS Change of Owner's Address (PTO Form 2197)