

SUPPORTING STATEMENT
United States Patent and Trademark Office
Submissions Regarding Correspondence and Regarding
Attorney Representation (Trademarks)
OMB Control Number 0651-0056
(June 2011)

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 that use, or intend to use, such marks in commerce may file an application to register their marks with the USPTO.

Such individuals and businesses may also submit various communications to the USPTO regarding their pending applications or registered trademarks, including providing additional information needed to process a pending application, filing amendments to the applications, or filing the papers necessary to keep a trademark in force. In the majority of circumstances, individuals and businesses retain attorneys to handle these matters. As such, these parties may also submit communications to the USPTO regarding the various activities related to the appointment and retention of attorneys and domestic representatives. Applicants and registrants may also submit change of address forms requesting that the USPTO amend the record of an application or registration by entering the new address.

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 in paper format or electronically through the Trademark Electronic Application System (TEAS). The USPTO has developed a new TEAS Global Form format that permits the agency to collect information electronically when a TEAS form having dedicated data fields is not yet available. This collection currently has three TEAS forms with dedicated data fields. As part of this renewal, the USPTO proposes to add three TEAS Global Forms – for changing the domestic representative's address, replacing the attorney of record with another already appointed attorney, and requesting the withdrawal of a domestic

representative – into the collection. The paper equivalents will be added as well. There are no official paper forms available for these items.

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, 2.24, and 2.193
Request for Permission to Withdraw as Attorney of Record	15 U.S.C. § 1123	37 CFR Part 2, 2.19
Change of Owner's Address Form	15 U.S.C. § 1123	37 CFR Part 2, 2.18 and 2.193
Change of Domestic Representative's Address	15 U.S.C. §§ 1051(e), 1058(f), 1123, and 1141h(d)	37 CFR Part 2, 2.18, 2.24, and 2.193
Replacement of Attorney of Record with Another Already Appointed Attorney	15 U.S.C. § 1123	37 CFR Part 2, 2.17
Request to Withdraw as Domestic Representative	15 U.S.C. §§ 1051(e), 1058(f), 1123, and 1141h(d)	37 CFR Part 2, 2.17 and 2.24

2. Needs and Uses

The USPTO uses the information described in this collection in various actions concerning the appointment and retention of attorneys and domestic representatives. 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 can also 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.

With the introduction in this renewal of the TEAS Global Forms format, the information in this collection can be collected in three different formats: paper format, electronically using the original TEAS forms, or electronically using the new TEAS Global Forms. This collection currently has three original TEAS forms with dedicated data fields; however, there are no official paper forms for these items. Individuals and businesses can submit their own paper forms, following the USPTO's rules and guidelines to ensure that all of the necessary information is provided. Applicants who choose to submit their applications electronically must use the TEAS forms.

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 this information collection and its supporting statement 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 (Paper)	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 (Paper)	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 (Paper)	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.
Change of Domestic Representative's Address (Paper)	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 domestic representative. Used by the USPTO to process requests to change the address of a domestic representative.

Form and Function	Form #	Needs and Uses
Change of Domestic Representative's Address (TEAS Global) (Ref. E)	TEAS Global Form	<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 domestic representative. Used by the USPTO to process electronically filed requests to change the address of a domestic representative.
Replacement of Attorney of Record with Another Already Appointed Attorney (Paper)	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 replacing the named attorney of record with another previously appointed associate attorney. Used by the USPTO to process requests that the named attorney of record be replaced with another previously appointed associate attorney.
Replacement of Attorney of Record with Another Already Appointed Attorney (TEAS Global) (Ref. F)	TEAS Global Form	<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 replacing the named attorney of record with another previously appointed associate attorney. Used by the USPTO to process electronically filed requests that the named attorney of record be replaced with another previously appointed associate attorney.
Request to Withdraw as Domestic Representative (Paper)	No Form Associated	<ul style="list-style-type: none"> Used by domestic representatives to submit a request to withdraw as the domestic representative. Used by the USPTO to process requests by domestic representatives to withdraw.
Request to Withdraw as Domestic Representative (TEAS Global) (Ref. G)	TEAS Global Form	<ul style="list-style-type: none"> Used by domestic representatives to electronically submit a request to withdraw as the domestic representative. Used by the USPTO to process electronically filed requests by domestic representatives to withdraw.

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, with dedicated data fields, through the web-accessible Trademark Electronic Application System (TEAS) for appointing an attorney or domestic representative, for revoking those appointments, to request permission to withdraw as the attorney of record, and to change the owner’s address. In addition, the USPTO has developed a new TEAS Global Form format that allows the agency to collect information electronically when a TEAS form having dedicated data fields is not yet available. At this time, three new TEAS Global Forms are being added into this collection.

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 Form 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 wrappers, entitled the Trademark Document Retrieval (TDR) system, from which the public can view and print images of the contents of trademark application and registration records. 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, change of owner's and domestic representative's addresses, replacements of attorney of record with another already appointed attorney, and requests to withdraw as a domestic representative are submitted to the USPTO. This collection does not solicit any data that is already available at the USPTO, nor does it create a duplication of effort.

5. Minimizing the Burden to Small Entities

The USPTO believes that the submission of this information 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 and registrants could not appoint attorneys/domestic representatives to represent them at the USPTO or revoke those appointments, nor could they request address changes. Likewise, attorneys and domestic representatives could not request permission to withdraw as the attorney of record or the domestic representative, nor could applicants and registrants request replacement of the attorney of record with another already appointed attorney. 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 March 15, 2011 (76 Fed Reg. 13987). The public comment period ended on May 16, 2011. No public comments were received in response to the Notice.

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 Form 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 123,010 responses per year for this collection, with 117,151 of them filed electronically.
- **Burden Hour Calculation Factors**
The USPTO estimates that it takes the public approximately 5 to 30 minutes (0.08 to 0.50 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 requests, and submit them 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 USPTO expects that attorneys will complete these submissions. The professional hourly rate of \$325 used in this submission to calculate the respondent cost burden is the median rate for attorneys in private firms as published in the 2009 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.

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 (Paper)	0.17	4,000	680	\$325.00	\$221,000.00
TEAS Revocation of Attorney/Domestic Representative and/or Appointment of Attorney/Domestic Representative (PTO Form 2196)	0.08	80,000	6,400	\$325.00	\$2,080,000.00
Request for Permission to Withdraw as Attorney of Record (Paper)	0.25	225	56	\$325.00	\$18,200.00
TEAS Request for Permission to Withdraw as Attorney of Record (PTO Form 2201)	0.20	4,500	900	\$325.00	\$292,500.00
Change of Owner's Address (Paper)	0.17	1,600	272	\$325.00	\$88,400.00
TEAS Change of Owner's Address Form (PTO Form 2197)	0.08	32,000	2,560	\$325.00	\$832,000.00
Change of Domestic Representative's Address (Paper)	0.17	13	2	\$325.00	\$650.00
Change of Domestic Representative's Address (TEAS Global)	0.08	250	20	\$325.00	\$6,500.00
Replacement of Attorney of Record with Another Already Appointed Attorney (Paper)	0.50	1	1	\$325.00	\$325.00
Replacement of Attorney of Record with Another Already Appointed Attorney (TEAS Global)	0.50	1	1	\$325.00	\$325.00
Request to Withdraw as Domestic Representative (Paper)	0.17	20	3	\$325.00	\$975.00
Request to Withdraw as Domestic Representative (TEAS Global)	0.08	400	32	\$325.00	\$10,400.00
Total	- - - -	123,010	10,927	- - - -	\$3,551,275.00

13. Total Annualized Cost Burden

This information collection has postage costs associated with it. It does not have any operation or maintenance costs, nor does it have filing fees.

Customers incur postage costs when submitting the information in paper format to the USPTO by mail through the United States Postal Service. The USPTO estimates that the majority (98%) of the paper forms are submitted to the USPTO via first-class mail. The USPTO estimates that these submissions will typically weigh approximately one ounce and that the first-class postage rate for these submissions is 44 cents. Out of 5,859 paper submissions, the USPTO estimates that 5,741 will be mailed to the agency.

Therefore, the USPTO estimates that the total postage cost for this collection is \$2,526 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	3,920	\$0.44	\$1,725.00
Request for Permission to Withdraw as Attorney of Record	221	\$0.44	\$97.00
Change of Owner's Address Form	1,568	\$0.44	\$690.00
Change of Domestic Representative's Address	12	\$0.44	\$5.00
Replacement of Attorney of Record with Another Already Appointed Attorney	1	\$0.44	\$1.00
Request to Withdraw as Domestic Representative	19	\$0.44	\$8.00
Total	5,741	- - - -	\$2,526.00

The USPTO estimates that the total annualized (non-hour) cost burden for this collection is \$2,526 per year.

14. Annual Cost to the Federal Government

The USPTO estimates that it takes a GS-7, step 5 employee between 5 and 7 minutes (0.08 and 0.12 hours) to process the revocations and appointments, between 1 and 5 minutes (0.02 and 0.08 hours) to process the change of owner's address, and between 3 and 5 minutes (0.05 and 0.08 hours) to process the change of domestic representative's address, replacement of attorney of record with another already appointed attorney, and request to withdraw as domestic representative. The current hourly rate for a GS-7, step 5 is \$22.92. When 30% is added to account for a fully loaded hourly rate (benefits and overhead), the cost per hour for a GS-7, step 5 is \$22.92 + \$6.88, for a rate of \$29.80.

The USPTO estimates that it takes a GS-15, step 5 employee 10 minutes (0.017 hours) to process the requests for permission to withdraw as the attorney of record filed on paper, but only 1 minute (0.02 hours) to process those that are filed through TEAS. The current hourly rate for a GS-15, step 5 is \$67.21. When 30% is added to account for a fully loaded hourly rate (benefits and overhead), the combined cost per hour for a GS-15, step 5 is \$67.21 + \$20.16, for a rate of \$87.37.

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 (Paper)	0.12	4,000	480	\$29.80	\$14,304.00
TEAS Revocation of Attorney/Domestic Representative and/or Appointment of Attorney/Domestic Representative (PTO Form 2196)	0.08	80,000	6,400	\$29.80	\$190,720.00
Request for Permission to Withdraw as Attorney of Record (Paper)	0.17	225	38	\$87.37	\$3,320.00
TEAS Request for Permission to Withdraw as Attorney of Record (PTO Form 2201)	0.02	4,500	90	\$87.37	\$7,863.00
Change of Owner's Address (Paper)	0.08	1,600	128	\$29.80	\$3,814.00
TEAS Change of Owner's Address Form (PTO Form 2197)	0.02	32,000	640	\$29.80	\$19,072.00
Change of Domestic Representative's Address (Paper)	0.08	13	1	\$29.80	\$30.00
Change of Domestic Representative's Address (TEAS Global)	0.05	250	13	\$29.80	\$387.00
Replacement of Attorney of Record with Another Already Appointed Attorney (Paper)	0.08	1	1	\$29.80	\$30.00
Replacement of Attorney of Record with Another Already Appointed Attorney (TEAS Global)	0.05	1	1	\$29.80	\$30.00
Request to Withdraw as Domestic Representative (Paper)	0.08	20	2	\$29.80	\$60.00
Request to Withdraw as Domestic Representative (TEAS Global)	0.05	400	20	\$29.80	\$596.00
Total	- - - - -	123,010	7,814	- - - - -	\$240,226.00

15. Reason for Change in Burden

Summary of Changes Since the Previous Submission

The OMB approved this information collection on September 15, 2008, with 160,004 responses, 12,491 burden hours, and \$7,317 in annualized (non-hour) costs.

With this renewal, the USPTO estimates that the total burden and annualized (non-hours) costs for this collection will be 123,010 responses, 10,927 burden hours, and \$2,526 in annualized costs, which is a reduction of 36,994 responses, 1,564 burden hours, and \$4,791 in annualized (non-hour) costs. These reductions are due to both program changes and administrative adjustments.

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

In the 60-Day Federal Register Notice published on March 15, 2011, the USPTO estimated that it would take ten minutes to complete the replacements of attorney of record with another already appointed attorney submitted in paper and five minutes to complete those submitted through TEAS. The USPTO estimated that one response would be submitted for each of these items and that they would have a total of roughly one burden hour for each of them. In this submission, the USPTO has reestimated the completion times for the paper and TEAS versions at 30 minutes. However, since the USPTO still estimates that only one response will be submitted for each of them, this new estimated completion time does not affect the burden hours for these requirements.

Changes in Respondent Cost Burden

The annual respondent cost burden for this collection has decreased since the last submission, despite the addition of six new items into this collection and an increase in the hourly rate for attorneys. The USPTO still expects that attorneys are the most likely to complete these submissions. In the previous submission, the hourly rate for attorneys was \$310, as reported in the 2007 report of the Committee on Economics of Legal Practice of the American Intellectual Property Law Association. For this submission, the USPTO is using the hourly rate of \$325 reported in the 2009 report. The USPTO estimates that the overall responses for this collection will decrease for this renewal and will offset the costs for the new items being added into the collection and the increase in the attorney hourly rate for the existing items. The USPTO estimates that the annual respondent cost burden will decrease by \$320,935, from \$3,872,210 to \$3,551,275.

Changes in Responses and Burden Hours

The USPTO estimates that the number of responses submitted annually for this collection will decrease by 36,994, from 160,004 to 123,010 responses per year. The USPTO further estimates that the reduced submissions will decrease the total burden hours for this collection by 1,564 hours, from 12,491 to 10,927 burden hours per year. These changes are due to both program changes and administrative adjustments, as follows:

- The USPTO estimates that the number of revocations of attorney/domestic representative and/or appointment of attorney/domestic representative filed in paper will decrease during this renewal period. The USPTO estimates that the number of submissions will decrease by 9,128 responses, from 13,128 to 4,000 responses per year. The USPTO estimates that this decrease will offset an increase in the estimated completion time for these revocations from six to ten minutes. The USPTO estimates that the total burden for this requirement will decrease by 633 hours, from 1,313 to 680 hours per year. **Therefore, this collection takes a burden reduction of 633 hours as an administrative adjustment.**

- The USPTO estimates that the number of revocations of attorney/domestic representative and/or appointment of attorney/domestic representative submitted through TEAS will decrease during this renewal period. The USPTO estimates that the submissions will decrease by 25,023 responses, from 105,023 to 80,000 responses per year. As a result, the USPTO estimates that the total burden for this requirement will decrease by 2,002 hours, from 8,402 to 6,400 burden hours per year. **Therefore, this collection takes a burden reduction of 2,002 hours as an administrative adjustment.**
- The USPTO estimates that the number of requests for permission to withdraw as the attorney of record filed in paper will decrease during this renewal period. The USPTO estimates that the submissions will decrease by 202 responses, from 427 to 225 responses per year. As a result, the USPTO estimates that the total burden for this requirement will decrease by 51 hours, from 107 to 56 burden hours per year. **Therefore, this collection takes a burden reduction of 51 hours as an administrative adjustment.**
- The USPTO estimates that the number of requests for permission to withdraw as the attorney of record submitted through TEAS will increase during this renewal period. The USPTO estimates that the submissions will increase by 1,081 responses, from 3,419 to 4,500 responses per year. As a result, the USPTO estimates that the total burden for this requirement will increase by 216 hours, from 684 to 900 hours per year. **Therefore, this collection takes a burden increase of 216 hours as an administrative adjustment.**
- The USPTO estimates that the number of change of owner's addresses filed in paper will decrease during this renewal period. The USPTO estimates that the submissions will decrease by 2,623 responses, from 4,223 to 1,600 responses per year. The USPTO estimates that this decrease will offset an increase in the estimated completion time for these items from four to 10 minutes. The USPTO estimates that the total burden for this requirement will decrease by 24 hours, from 296 to 272 hours per year. **Therefore, this collection takes a burden reduction of 24 hours as an administrative adjustment.**
- The USPTO estimates that the number of change of owner's addresses filed through TEAS will decrease during this renewal period. The USPTO estimates that the submissions will decrease by 1,784 responses, from 33,784 to 32,000 responses per year. However, the USPTO also estimates that the time to complete these items will increase from three to five minutes and that this will offset the reduced submissions. Consequently, the USPTO estimates that the total burden for this requirement will increase by 871 hours, from 1,689 to 2,560 hours per year. **Therefore, this collection takes a burden increase of 871 hours as an administrative adjustment.**
- The USPTO has created a new TEAS Global form for change of domestic representative's address and is adding the TEAS and paper formats into the

collection at this time. The USPTO estimates that it will take five minutes to complete the change of domestic representative's address through TEAS, and that 250 responses will be submitted per year for a total burden of 20 hours per year. For the paper submissions, the USPTO estimates that it will take 10 minutes to complete them, and that 13 responses will be submitted per year for a total burden of 2 hours per year. **Therefore, this collection takes a burden increase of 22 hours as a program change.**

- The USPTO has created a new TEAS Global form for the replacement of the attorney of record with another already appointed attorney and is adding the TEAS and paper formats into the collection at this time. The USPTO estimates that it will take 30 minutes to complete these requests through TEAS and that 1 response will be submitted for a total burden of 1 hour per year. The USPTO also estimates that it will take 30 minutes to complete these requests in paper and that it will also have 1 response for a total burden of 1 hour per year. **Therefore, this collection takes a burden increase of 2 hours as a program change.**
- The USPTO has created a new TEAS Global form for the requests to withdraw as domestic representative and is adding the TEAS and paper formats into the collection at this time. The USPTO estimates that it will take 5 minutes to complete these requests through TEAS and that 400 responses will be submitted per year for a total burden of 32 hours per year. The USPTO estimates that it will take 10 minutes to complete these requests in paper and that 20 responses will be submitted per year for a total burden of 3 hours per year. **Therefore, this collection takes a burden increase of 35 hours as a program change.**

The USPTO estimates that a net total of 1,564 burden hours will be reduced from this collection, from 12,491 to 10,927 burden hours per year. The USPTO estimates that 59 burden hours per year will be added to the collection due to program changes. The USPTO also estimates that 1,087 burden hours per year will be added to the collection as a result of administrative adjustments, but that this increase will be offset by a reduction of 2,710 burden hours, for a total reduction of 1,623 burden hours per year due to administrative adjustments. The USPTO estimates that this decrease will offset the increase due to the program changes. **Therefore, this information has a net burden decrease of 1,564 hours, with an increase of 59 hours due to program changes and a reduction of 1,623 hours 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 decrease by \$4,791, from \$7,317 to \$2,526 per year. This change is due to both program changes and administrative adjustments, as follows:

- The USPTO estimates that the postage costs for the paper submissions of the revocation of attorney/domestic representative and/or appointment of attorney/domestic representative will decrease during this renewal period. The

USPTO estimates that the postage costs will decrease by \$3,678, from \$5,403 to \$1,725 per year. The USPTO estimates that the number of mailed submissions will decrease by 8,945 responses, from 12,865 to 3,920 responses per year and that this decrease offsets the increase in the first-class postage rates from 42 to 44 cents. **Therefore, this collection has a reduction of \$3,678 in annual (non-hour) postage costs due to an administrative adjustment.**

- The USPTO estimates that the postage costs for the paper submissions of the requests for permission to withdraw as the attorney of record will decrease during this renewal period. The USPTO estimates that the postage costs will decrease by \$79, from \$176 to \$97 per year. The USPTO estimates that the number of mailed submissions will decrease by 197 responses, from 418 to 221 responses per year and that this decrease offsets the increase in the first-class postage rates from 42 to 44 cents. **Therefore, this collection has a reduction of \$79 in annual (non-hour) postage costs due to an administrative adjustment.**
- The USPTO estimates that the postage costs for the paper submissions of the change of owner's address form will decrease during this renewal period. The USPTO estimates that the postage costs will decrease by \$1,048, from \$1,738 to \$690 per year. The USPTO estimates that the number of mailed submissions will decrease by 2,571 responses, from 4,139 to 1,568 responses per year and that this decrease offsets the increase in the first-class postage rates from 42 to 44 cents. **Therefore, this collection has a reduction of \$1,048 in annual (non-hour) postage costs due to an administrative adjustment.**
- In addition to the TEAS Global forms for the change to domestic representative's address form, the replacement of attorney of record with another already appointed attorney, and request to withdraw as domestic representative, the USPTO is also adding the paper formats for these requirements into the collection at this time. The USPTO estimates that these items will be mailed to the USPTO using the first-class postage rate of 44 cents. The USPTO estimates that 12 changes of domestic representative's addresses, 1 replacement of attorney of record with another already appointed attorney, and 19 requests to withdraw as domestic representatives will be mailed to the USPTO per year, for a total postage cost of \$14 per year. **Therefore, this collection has an increase of \$14 in annual (non-hour) postage costs due to program changes.**

The USPTO estimates that the annual (non-hour) costs for this collection will decrease by \$4,791, from \$7,317 to \$2,526 per year. The USPTO estimates that \$14 will be added to this collection as a result of program changes. However, the USPTO estimates that this increase will be offset by a reduction of \$4,805 due to administrative adjustments. **Therefore, this information collection has a net total reduction of \$4,791 in annual (non-hour) costs, with an increase of \$14 due to program changes offset by a decrease of \$4,805 due to administrative adjustments.**

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)
- E. Change of Domestic Representative's Address (TEAS Global Form)
- F. Replacement of Attorney of Records with Another Already Appointed Attorney (TEAS Global Form)
- G. Request to Withdraw as Domestic Representative (TEAS Global Form)