

SUPPORTING STATEMENT
United States Patent and Trademark Office
Submissions Regarding Correspondence and Regarding
Attorney Representation (Trademarks)
OMB Control Number 0651-0056
(July 2014)

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.

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 and to submit communications to the USPTO regarding the various activities related to the appointment and retention of attorneys and domestic representatives.

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 information in this collection can be submitted in paper format or electronically through the Trademark Electronic Application System (TEAS). This collection currently has TEAS forms (PTO Form 2196, 2201) with dedicated data fields. The USPTO also utilizes a TEAS Global Form format that permits the agency to collect information electronically when a TEAS form having dedicated data fields is not available.

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
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 also a matter of public record and is utilized by the public for a variety of private business purposes related to establishing and enforcing trademark rights. The information is accessible online, through the USPTO website, as well as through various USPTO facilities. 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. For more specific needs and uses of the collected information, see Table 2.

The information in this collection can be collected in three different ways: through a paper submission, a dedicated TEAS form, or the global TEAS form. There are TEAS forms (PTO Form 2196, 2201) 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.

This proposed collection of information will be collected, maintained, and used in a way consistent with all applicable OMB and USPTO Information Quality Guidelines, in conformance with Section 515 Public Law 106. (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)

1	Form and Function	Form #	Needs and Uses
1	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.
2	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.
3	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.
4	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.
5	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.
6	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.
7	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.
8	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 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 allows the user to choose from four different search tools, is updated daily, and is easy to use. 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.

As mentioned earlier, the USPTO provides various electronic forms online. Through the web-accessible Trademark Electronic Application System (TEAS), there are dedicated forms for appointing an attorney or domestic representative, revoking those appointments, requesting permission to withdraw as the attorney of record, and changing the owner’s address. The USPTO also utilizes a TEAS Global Form that allows the agency to collect information electronically when a specific TEAS form having dedicated data fields is not available.

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 are filed 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.

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, 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 is unique to USPTO and does not solicit any data that is already available at the agency, 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. 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 May 13, 2014 (79 Fed Reg. 27284). The public comment period ended on July 14, 2014. No public comments were received in response to the Notice.

The USPTO has long-standing relationships with groups from whom trademark data is collected, such as the Trademark Public Advisory Committee (T-PAC). 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.

Views expressed by these groups are considered in developing proposals for information collection requirements and during the renewal of an information collection. No views have been expressed impacting the present renewal.

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.

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 108,940 responses per year for this collection, with 103,751 of them filed through TEAS.

- **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 believes that attorneys will complete these applications. The USPTO uses a professional rate of \$389 per hour for respondent cost burden calculations, which is the mean rate for attorneys in private firms as shown in the 2013 Report of the Economic Survey, published by the Committee on Economics of Legal Practice of the American Intellectual Property Law Association (AIPLA).

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)
1	Revocation of Attorney/Domestic Representative and/or Appointment of Attorney/Domestic Representative (Paper)	0.17	4,750	808	\$389.00	\$314,118
2	TEAS Revocation of Attorney/Domestic Representative and/or Appointment of Attorney/Domestic Representative (PTO Form 2196)	0.08	95,000	7917	\$389.00	\$3,079,713
3	Request for Permission to Withdraw as Attorney of Record (Paper)	0.25	425	106	\$389.00	\$41,234
4	TEAS Request for Permission to Withdraw as Attorney of Record (PTO Form 2201)	0.20	8,500	1700	\$389.00	\$661,300
5	Replacement of Attorney of Record with Another Already Appointed Attorney (Paper)	0.50	1	1	\$389.00	\$389
6	Replacement of Attorney of Record with Another Already Appointed Attorney (TEAS Global)	0.50	1	1	\$389.00	\$389
7	Request to Withdraw as Domestic Representative (Paper)	0.17	13	2	\$389.00	\$778
8	Request to Withdraw as Domestic Representative (TEAS Global)	0.08	250	21	\$389.00	\$8,169
	Total	- - -	108,940	10,540	- - - -	\$4,100,060

13. Total Annualized Cost Burden

The sole source of non-hour cost burden associated with this information collection is postage costs for sending paper applications. The USPTO estimates that these submissions will typically weigh approximately one ounce and that the first-class postage rate for these submissions is 49 cents. Additionally, the USPTO estimates that 98% of the paper filings will be mailed to the agency, totaling 5,086 submissions. Therefore, the USPTO estimates that the total annualized (non-hour) cost burden for this collection is \$2,492 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)
1	Revocation of Attorney/Domestic Representative and/or Appointment of Attorney/Domestic Representative	4,655	\$0.49	\$2,280.95.00
3	Request for Permission to Withdraw as Attorney of Record	417	\$0.49	\$204.33
5	Replacement of Attorney of Record with Another Already Appointed Attorney	1	\$0.49	\$0.49
7	Request to Withdraw as Domestic Representative	13	\$0.49	\$6.37
	Total	5,086	- - - -	\$2,493.00

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, and between 3 and 5 minutes (0.05 and 0.08 hours) to process 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, in DC area, is \$23.15. 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 \$23.15 + \$6.95, for a rate of \$30.10.

The USPTO estimates that it takes a GS-15, step 5 employee 10 minutes (0.17 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, in the DC area, is \$67.88. 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 \$67.88 + \$20.37, for a rate of \$88.25.

Table 6 illustrates 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)
1	Revocation of Attorney/Domestic Representative and/or Appointment of Attorney/Domestic Representative (Paper)	0.12	4,750	570	\$30.10	\$17,157.00

	Item	Hours (a)	Responses (yr) (b)	Burden (hrs/ yr) (c) (a) x (b)	Rate (\$/hr) (d)	Total Cost (\$/hr) (e) (c) x (d)
2	TEAS Revocation of Attorney/Domestic Representative and/or Appointment of Attorney/Domestic Representative (PTO Form 2196)	0.08	95,000	7600	\$30.10	\$228,760.00
3	Request for Permission to Withdraw as Attorney of Record (Paper)	0.17	425	72	\$88.25	\$6,354.00
4	TEAS Request for Permission to Withdraw as Attorney of Record (PTO Form 2201)	0.02	8,500	170	\$88.25	\$15,002.50
5	Replacement of Attorney of Record with Another Already Appointed Attorney (Paper)	0.08	1	1	\$30.10	\$30.10
6	Replacement of Attorney of Record with Another Already Appointed Attorney (TEAS Global)	0.05	1	1	\$30.10	\$30.10
7	Request to Withdraw as Domestic Representative (Paper)	0.08	13	1	\$30.10	\$30.10
8	Request to Withdraw as Domestic Representative (TEAS Global)	0.05	250	13	\$30.10	\$391.30
	Total	- - - - -	108.940	8,428	- - - - -	\$267,755.10

15. Reason for Change in Burden

Summary of Changes Since the Previous Submission

The OMB approved this information collection on September 15, 2011, with 123,010 responses, 10,927 respondent burden hours, and \$2,526 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 108,940 responses, 10,540 respondent burden hours, and \$2,545 in annualized costs, which is a decrease of 387 burden hours, and an increase of \$19 in annualized (non-hour) costs. These decreases and increases are due to administrative adjustments.

Changes in Respondent Cost Burden

The annual respondent cost burden for this collection has increased since the last submission. While the changes of address forms have been removed from the collection, the overall rise in numbers of other respondents and the increase in hourly rate for attorneys contribute to a cost burden increase. The USPTO still expects that attorneys are the most likely to complete these submissions. In the previous submission, the hourly rate for attorneys was \$325, as reported in the 2009 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 \$389 reported in the 2013 report. The USPTO estimates that the annual respondent cost burden will increase by \$548,785, from \$3,551,275 to \$4,100,060.

Changes in Responses and Burden Hours

The USPTO estimates that the number of responses submitted annually for this collection will decrease by 14,070, from 123,010 to 108,940 responses per year. The USPTO further estimates that there will be a decrease in the total burden hours for this collection by 387 hours, from 10,927 to 10,540 burden hours per year. These changes are due to administrative adjustments, as follows:

- The USPTO estimates that the number of revocations of attorney/domestic representative and/or appointment of attorney/domestic representative filed on paper will increase during this renewal period. The USPTO estimates that the number of submissions will increase by 750 responses, from 4,000 to 4,750 responses per year. The USPTO estimates that the total burden for this requirement will increase by 128 hours, from 680 to 808 hours per year. **Therefore, this collection takes a burden increase of 128 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 increase during this renewal period. The USPTO estimates that the submissions will increase by 15,000 responses, from 80,000 to 95,000 responses per year. As a result, the USPTO estimates that the total burden for this requirement will increase by 1,517 hours, from 6,400 to 7,917 burden hours per year. **Therefore, this collection takes a burden increase of 1,517 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 increase during this renewal period. The USPTO estimates that the submissions will increase by 20 responses, from 225 to 425 responses per year. As a result, the USPTO estimates that the total burden for this requirement will increase by 50 hours, from 56 to 106 burden hours per year. **Therefore, this collection takes a burden increase of 50 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 4,000 responses, from 4,500 to 8,500 responses per year. As a result, the USPTO estimates that the total burden for this requirement will increase by 800 hours, from

900 to 1,700 hours per year. **Therefore, this collection takes a burden increase of 800 hours as an administrative adjustment.**

- The USPTO has concluded, with agreement from OMB¹, that changes of address forms are exempt from the PRA under section 5 CRF 1320.3. Therefore USPTO is removing both the change of owner's and the change of domestic representative's address forms filed both through paper and TEAS from this collection, as address changes are considered exempt from the paperwork reduction act provisions. Accordingly, the USPTO will remove 33,863 responses from this collection which will result in a decrease of 2854 hours in the total burden. **Therefore, this collection takes a burden reduction of 2854 hours as an administrative adjustment.**
- The USPTO estimates that the number of the requests to withdraw as a domestic representative by both paper and TEAS format will decrease during this renewal period. The USPTO estimates that the number of submissions will decrease by 150 responses, from 400 to 250 responses per year. The USPTO estimates that the total burden for this requirement will decrease by 14 hours, from 35 to 21 hours per year. **Therefore, this collection takes a burden reduction of 14 hours as an administrative adjustment.**

The USPTO estimates that a net total of 387 burden hours will be reduced from this collection, from 10,927 to 10,540 burden hours per year. The USPTO estimates that 2479 burden hours per year will be added to the collection due to administrative adjustments. The USPTO also estimates that 2,866 burden hours per year will be reduced from this collection due to an administrative adjustment for a total reduction of 387 burden hours. **Therefore, this information has a net burden decrease of 387 hours, with an increase of 2479 hours due to an administrative adjustment, and a reduction of 2,866 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 increase by \$19, from \$2,526 to \$2,545 per year. This change is due to 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 increase during this renewal period. The USPTO estimates that the postage costs will increase by \$603, from \$1,725 to

¹ April 7, 2010 Memorandum from Cass R. Sunstein, Administrator, Office of Information and Regulatory Affairs, Office of Management and Budget, to the Heads of Executive Departments and Agencies, and Independent Regulatory Agencies, titled *Information Collection under the Paperwork Reduction Act*, http://www.whitehouse.gov/sites/default/files/omb/assets/inforeg/PRAPrimer_04072010.pdf.

\$2,328 per year. The USPTO estimates that the number of mailed submissions will increase by 735 responses, from 3,920 to 4,655 responses per year and that this increase will accompany the increase in the first-class postage rates from 44 to 49 cents. **Therefore, this collection has an increase of \$603 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 increase during this renewal period. The USPTO estimates that the postage costs will decrease by \$112, from \$97 to \$209 per year. The USPTO estimates that the number of mailed submissions will increase by 196 responses, from 221 to 417 responses per year and that this increase accompanies the increase in the first-class postage rates from 44 to 49 cents. **Therefore, this collection has an increase of \$112 in annual (non-hour) postage costs due to an administrative adjustment.**
- The USPTO has exempted change of owner's and change of domestic representative's address forms filed both through paper and TEAS from this collection. Accordingly, the USPTO estimates that the postage costs will decrease by \$695, from \$695 to \$0 per year. Additionally, the USPTO estimates that the submissions accounted for will decrease by 1,580 responses, from 1,580 to 0 responses per year. **Therefore, this collection has a reduction of \$695 in annual (non-hour) postage costs due to an administrative adjustment.**
- The USPTO estimates that the postage costs for the request to withdraw as domestic representative will decrease. The USPTO estimates that the postage costs will decrease by \$1, from \$8 to \$7 per year. The USPTO estimates that the number of mailed submissions will decrease by 6 responses, from 19 to 13 responses per year and that this decrease will be offset by the increase in the first-class postage rates from 44 to 49 cents. **Therefore, this collection has a reduction of \$1 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 \$19, from \$2,526 to \$2,545 per year. The USPTO estimates that \$695 will be subtracted from this collection as a result of administrative adjustments. However, the USPTO estimates that this decrease will be offset by an increase of \$714 due to administrative adjustments. **Therefore, this information collection has a net total increase of \$19 in annual (non-hour) costs, with a decrease of \$695 due to an administrative adjustment offset by an increase of \$714 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.