

SUPPORTING STATEMENT
United States Patent and Trademark Office
Representative and Address Provisions
OMB CONTROL NUMBER 0651-0035
2025

A. JUSTIFICATION

- 1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the information collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.**

This information collection includes the information necessary to submit a request to grant or revoke power of attorney for an application, patent, or reexamination proceeding, and for a registered practitioner to withdraw as attorney or agent of record. This also includes the information necessary to change the correspondence address for an application, patent, or reexamination proceeding, to request a Customer Number and manage the correspondence address and list of practitioners associated with a Customer Number, and to designate or change the correspondence address or fee address for one or more patents or applications by using a Customer Number.

Under 35 U.S.C. 2 and 37 CFR §§ 1.31-1.32, power of attorney may be granted to one or more joint inventors or a person who is registered to practice before the USPTO to act in an application or a patent. In particular, for an application filed before September 16, 2012, or for a patent which issued from an application filed before September 16, 2012, power of attorney may be granted by the applicant for patent (as set forth in 37 CFR § 1.41(b) (pre-AIA)) or the assignee of the entire interest of the applicant. For an application filed on or after September 16, 2012, or for a patent which issued from an application filed on or after September 16, 2012, power of attorney may be granted by the applicant for patent (as set forth in 37 CFR § 1.42) or the patent owner. The USPTO provides two different versions of most forms for establishing power of attorney based upon whether the application was filed before September 16, 2012 or was filed on or after September 16, 2012. Providing forms based upon whether the application was filed before September 16, 2012 or was filed on or after September 16, 2012 reduces applicants' burden in having to determine the appropriate power of attorney requirements for a given application.

37 CFR § 1.36 provides for the revocation of a power of attorney at any stage in the proceedings of a case. 37 CFR § 1.36 also provides a path by which a registered patent attorney or patent agent who has been given a power of attorney may withdraw as attorney or agent of record.

A Customer Number is a unique number created by the USPTO and is used instead of a physical address. The Customer Number allows a group of filings to be associated with a single correspondence mailing address. The USPTO's Customer Number

practice permits applicants, patent owners, assignees, and practitioners of record, or the representatives of record for a number of applications or patents, to change the correspondence address of a patent application or patent with one change request instead of filing separate requests for each patent or application. Any changes to the address or practitioner information associated with a Customer Number will be applied to all patents and applications associated with said Customer Number.

Changes of correspondence address or power of attorney may be filed separately for each patent or application without using a Customer Number. However, a valid Customer Number provides secure access to patent information through the registered USPTO.gov account using the USPTO patent electronic filing system (Patent Center), which is available through the USPTO website. Additionally, the use of a Customer Number is also required in order to grant power of attorney to more than ten practitioners or to establish a separate “fee address” for maintenance fee purposes that is different from the correspondence address for a patent or application.

Table 1 provides the specific statutes and regulations authorizing the USPTO to collect the information discussed above.

Table 1: Information Requirements

Item No.	Requirement	Statute	Regulations
1	Power of Attorney	35 U.S.C. 2	37 CFR §§ 1.31, 1.32, 1.510, and 1.915
2-3	Revocation of Power of Attorney	35 U.S.C. 2	37 CFR § 1.36(a)
4-5	Reexamination – Patent Owner Power of Attorney or Revocation of Power of Attorney	35 U.S.C. 2	37 CFR §§ 1.31, 1.32, 1.36(a), 1.510, and 1.915
6	Withdrawal as Attorney or Agent	35 U.S.C. 2	37 CFR § 1.36(b)
7-8	Petition to Grant or Revoke Power of Attorney by Fewer than All the Applicants	35 U.S.C. 2	37 CFR §§ 1.17(f), 1.32(b)(4), 1.36(a)
9-10	Request for Customer Number or Customer Number Data Change	35 U.S.C. 2	37 CFR §§ 1.32 and 1.33
11	Customer Number Upload Spreadsheet	35 U.S.C. 2	37 CFR §§ 1.33 and 1.363
12	Request to Update a PCT Application with a Customer Number	35 U.S.C. 2	37 CFR § 1.33

2. Indicate how, by whom, and for what purpose the information is to be used. Except for a new information collection, indicate the actual use the agency has made of the information received from the current information collection.

The public uses this information collection to grant or revoke power of attorney, to withdraw as attorney or agent of record, to authorize a practitioner to act in a representative capacity, to change a correspondence address, to request a Customer Number, and to change the data associated with a Customer Number. This information collection is necessary so that the USPTO knows who is authorized to take action in an application, patent, or reexamination proceeding and where to send correspondence regarding an application, patent, or reexamination proceeding.

The information collected, maintained, and used in this information collection is based on OMB and USPTO guidelines. This includes the basic information quality standards established in the Paperwork Reduction Act (44 U.S.C. Chapter 35), in OMB Circular A-130, and in the USPTO information quality guidelines.

Table 2 outlines how this collection of information is used by the public and the USPTO.

Table 2: Needs and Uses

Item No.	Form/Function	Form No.	Needs and Uses
1	Power of Attorney to Prosecute Applications Before the USPTO	PTO/SB/80 PTO/AIA/80	<ul style="list-style-type: none"> • SB/80: used by an assignee to appoint an attorney or agent in all applications filed before September 16, 2012, in which the assignee is the assignee of record of the entire interest and to change the correspondence address for the application(s). • AIA/80: used by an assignee to appoint an attorney or agent in all applications filed on or after September 16, 2012, in which the assignee is or is becoming the named applicant and to change the correspondence address for the application(s). • The advantage of both the SB/80 and AIA/80 is that an assignee only has to sign one SB/80 or AIA/80; copies can then be used to establish the desired power of attorney in (all) compliant patent applications of the assignee. • Both forms are used by the USPTO to determine who is authorized to act on behalf of the assignee and to change the correspondence address for the applications.

2	Power of Attorney or Revocation of Power of Attorney with a New Power of Attorney and Change of Correspondence Address	PTO/AIA/82A PTO/AIA/82B PTO/AIA/82C Translations thereof	<ul style="list-style-type: none"> • SB/81: Used by the applicant or assignee of record of the entire interest in an application filed before September 16, 2012, to revoke all previous powers of attorney, appoint a practitioner, and change the correspondence address. • AIA/81: Used by <i>pro se</i> inventors who are the applicant in an application filed on or after September 16, 2012, to revoke all previous powers of attorney in the application, appoint one or more of the joint inventors as having power of attorney, and change the correspondence address. • AIA/82A: Used by the applicant in an application filed on or after September 16, 2012, to identify the application to which the Power of Attorney is directed. • AIA/82B: Used by the applicant in an application filed on or after September 16, 2012, to revoke all previous powers of attorney in the application, appoint a practitioner, and change the correspondence address. • AIA/82C: Used by the applicant in an application filed on or after September 16, 2012, to appoint up to 10 practitioners by name and registration number. • Each of these forms is used by the USPTO to determine who is authorized to act on behalf of the applicant or assignee, to process a request to revoke a power of attorney and to grant a new power of attorney, and to change the correspondence address for the identified application.
3	Patent – Power of Attorney or Revocation of Power of Attorney with a New Power of Attorney and Change of Correspondence Address	PTO/SB/81 PTO/AIA/81 PTO/SB/81A PTO/AIA/81A	<ul style="list-style-type: none"> • SB/81A: Used by an inventor or patent owner in a patent that issued from an application filed before September 16, 2012, to revoke all previous powers of attorney in the patent, appoint a practitioner, and change the correspondence address. • AIA/81A: Used by the applicant or patent owner in a patent that issued from an application filed on or after September 16, 2012, to revoke all previous powers of attorney in the patent, appoint a practitioner, and change the correspondence address. • Both forms are used by the USPTO to determine who is authorized to act on behalf of the inventor, applicant, or patent owner, to process a request to revoke a power of attorney and to grant a new power of attorney, and to change the correspondence address for the identified patent.
4	Reexamination – Patent Owner Power of Attorney or Revocation of Power of Attorney with a New Power of Attorney and Change of Correspondence Address	PTO/SB/81B PTO/AIA/81B	<ul style="list-style-type: none"> • SB/81B: Used by an inventor or patent owner in a reexamination proceeding in which the patent being reexamined issued from an application filed before September 16, 2012, to revoke all previous powers of attorney in the patent, appoint a practitioner, and change the correspondence address for the reexamination proceeding. • AIA/81B: Used by the applicant or patent owner in a reexamination proceeding in which the patent being reexamined issued from an application filed on or after September 16, 2012, to revoke all previous powers of attorney in the patent, appoint a practitioner, and change the correspondence address for the reexamination proceeding. • Both forms are used by the USPTO to determine who is authorized to act on behalf of the inventor, applicant, or patent owner, to process a request to revoke a power of attorney and to grant a new power of attorney, and to change the correspondence address in a reexamination proceeding.

5	Reexamination – Third Party Requester Power of Attorney or Revocation of Power of Attorney with a New Power of Attorney and Change of Correspondence Address	PTO/SB/81C	<ul style="list-style-type: none"> Used by a third-party requester to revoke all previous powers of attorney in a reexamination proceeding, appoint a practitioner, and change the correspondence address for the reexamination proceeding. Used by the USPTO to determine who is authorized to act on behalf of a third-party requester, to process a request to revoke a power of attorney and to grant a new power of attorney, and to change the correspondence address in a reexamination proceeding.
6	Request for Withdrawal as Attorney or Agent and Change of Correspondence Address	PTO/SB/83 PTO/AIA/83	<ul style="list-style-type: none"> SB/83: Used by a practitioner to withdraw as the attorney or agent of record for an application filed before September 16, 2012, and to change the correspondence address for the application. AIA/83: Used by a practitioner to withdraw as the attorney or agent of record for an application filed on or after September 16, 2012, and to change the correspondence address for the application. Both forms are used by the USPTO to process the withdrawal request and to change the correspondence address for the identified application.
7	Petition Under 37 CFR 1.36(a) to Revoke Power of Attorney by Fewer than All the Applicants	No Form	<ul style="list-style-type: none"> Used by an applicant or assignee to request that power of attorney in an application be allowed to be revoked by fewer than all the applicants or assignees of the entire interest. Used by the USPTO to determine whether the request to revoke power of attorney should be granted.
8	Petition to Waive 37 CFR 1.32(b)(4) and Grant Power of Attorney by Fewer than All the Applicants	No Form	<ul style="list-style-type: none"> Used by an applicant or assignee to request that power of attorney in an application be allowed to be granted by fewer than all the applicants or assignees of the entire interest. Used by the USPTO to determine whether the request to grant power of attorney should be granted.
9	Request for Customer Number or Customer Number Data Change	PTO/SB/124	<ul style="list-style-type: none"> Used by the applicant, assignee, practitioner of record, or third-party requester to change the correspondence address or list of registered practitioners associated with an existing Customer Number. Used by the USPTO to process a request for a Customer Number data change.
10	Request for Customer Number	PTO/SB/125	<ul style="list-style-type: none"> Used by the public to request a Customer Number and associate a correspondence address or list of registered practitioners with that Customer Number. Used by the USPTO to assign new Customer Numbers and associate a specified address and a list of registered practitioners with a new Customer Number.
11	Customer Number Upload Spreadsheet	None	<ul style="list-style-type: none"> Used by an applicant, assignee, practitioner of record, or third-party requester to change the correspondence address or fee address for a list of applications, patents, and/or reexamination proceedings by using a Customer Number. Used by the USPTO to process a request to change the correspondence address or fee address for a list of applications, patents, and/or reexamination proceedings.
12	Request to Update a PCT Application with a Customer Number	PTO-2248	<ul style="list-style-type: none"> Used by an applicant to associate an already established PCT paper application with an existing Customer Number. Used by the USPTO to process a request to associate an existing PCT application with a Customer Number.

3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of responses, and the basis for the decision for adopting this means of information collection. Also describe any consideration of using information technology to reduce burden.

The forms associated with this information collection may be downloaded from the USPTO website in Portable Document Format (PDF), filled out electronically, and then either printed for mailing or submitted online to the USPTO.

Customers may submit a batch request in spreadsheet format to designate or change the correspondence address and/or fee address for a list of patents, applications, or reexamination proceedings by associating them with a Customer Number. The Customer Number Upload Spreadsheet file may be submitted to the USPTO on a computer-readable diskette or compact disc (CD) with a signed cover letter requesting entry of the address changes. The spreadsheet and cover letter must be mailed to the USPTO and cannot be filed electronically. Customers may download a Microsoft Excel template with instructions from the USPTO web site to assist them in preparing the spreadsheet in the proper format. The USPTO permits electronic submission of the Customer Number Upload Spreadsheets via Patent Center for spreadsheets having 20 or fewer customer number associations. Use of the Customer Number Upload Spreadsheet reduces the chance of errors and ensures that the USPTO avoids changing the address data for the wrong patent, application, or reexamination proceeding.

The other items in this information collection may be submitted to the USPTO online through Patent Center. Patent Center is the USPTO's web-based patent application and document submission system that allows customers to file patent applications and associated documents electronically through their standard web browser without downloading special software, changing their document preparation tools, or altering their workflow processes. Typically, the customer will prepare the forms or documents and then upload them as standard PDF files to the USPTO servers using the secure Patent Center interface. For one item in this information collection, the Request for Withdrawal as Attorney or Agent, the customer may choose to enter the information directly into the Patent Center interface screens instead of using the PDF form. Patent Center offers many benefits to filers, including immediate notification that a submission has been received by the USPTO, automated processing of requests, and avoidance of postage or other paper delivery costs.

To protect the confidentiality, authenticity, and integrity of electronic submissions, the USPTO employs Public Key Infrastructure (PKI) technology for secure electronic communications with its customers. All electronic submissions are automatically encrypted prior to transmission to ensure confidentiality of the submission contents. After the electronic package has been received by the USPTO, the Patent Center server uses digital signature technology to verify that the package contents have not

been altered and generates an electronic acknowledgement receipt that is immediately returned to the customer.

Customers must have a Customer Number that is associated with the correspondence address for a patent application in order to access private information about the application using Patent Center which is available through the USPTO website. Patent Center allows authorized individuals secure and immediate online access to up-to-date patent application status and history information, but only for patent applications that are linked to a Customer Number. Patent Center also offers public access to non-private information about issued patents and published applications.

4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2 above.

This information is collected only when a respondent grants or revokes power of attorney in an application, withdraws as attorney of record, changes a correspondence address and/or fee address via a Customer Number Upload Spreadsheet, requests a Customer Number, or changes data associated with a Customer Number. This information is not collected elsewhere. However, if a customer submits Customer Number forms containing a large amount of data, such as associating Customer Number data with a large number of patents or applications, the USPTO may in some case contact the customer and request that the data be resubmitted using the Customer Number Upload Spreadsheet format in order to facilitate accurate uploading of the data into USPTO databases.

Additionally, the Customer Number Upload Spreadsheet instructs the user to provide both the Customer Number and the correspondence address associated with the Customer Number. This correspondence address is already on file with the Customer Number, but the USPTO requests this information in order to verify that the Customer Number submitted is correct for associating the patents and applications listed on the spreadsheet.

5. If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden.

No significant impact is placed on small entities.

6. Describe the consequence to federal program or policy activities if the information collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.

This information is collected only when an applicant, assignee, or practitioner of record submits an application, or when an applicant, assignee, practitioner of record, or third-party requester designates or changes their representative or correspondence address, or requests a Customer Number. This information collection could not be conducted

less frequently. If the collection of information were not conducted, the USPTO would not know who is authorized to take action in an application, patent, or reexamination proceeding and could not communicate with the applicant, assignee, practitioner of record, third party requester or authorized representative concerning the application, patent, or reexamination proceeding.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner:

- **requiring respondents to report information to the agency more often than quarterly;**
- **requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;**
- **requiring respondents to submit more than an original and two copies of any document;**
- **requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records, for more than three years;**
- **in connection with a statistical survey, that is not designed to produce valid and reliable results that can be generalized to the universe of study;**
- **requiring the use of a statistical data classification that has not been reviewed and approved by OMB;**
- **that includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or**
- **requiring respondents to submit proprietary trade secrets, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.**

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

8. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden. Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of information collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported. Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every 3 years - even if the collection of information activity is the same as in prior periods. There may be

circumstances that may preclude consultation in a specific situation. These circumstances should be explained.

The 60-Day Notice was published in the *Federal Register* on May 21, 2025 (90 FR 21760).¹ The comment period ended on July 21, 2025. The USPTO received no public comments in response to the notice.

The USPTO published a 30-day notice in the *Federal Register* on September 15, 2025 (90 FR 44372).² The comment period will close on October 15, 2025.

9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.

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

10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy. If the information collection requires a system of records notice (SORN) or privacy impact assessment (PIA), those should be cited and described here.

The confidentiality of patent applications is governed by statute (35 U.S.C 122) and regulation (37 CFR §§ 1.11 and 1.14). The USPTO has a legal obligation to maintain the confidentiality of the contents of unpublished patent applications and related documents. Upon publication of an application or issuance of a patent, the patent application file is made available to the public, subject to the provisions for providing only a redacted copy of the file contents (37 CFR §§ 1.11(a) and 1.217).

Applications filed through Patent Center are maintained in confidence as required by 35 U.S.C. 122(a) until the application is published or issued as a patent. The confidentiality, security, integrity, authenticity, and non-repudiation of patent applications submitted electronically through Patent Center are maintained using TLS or SSL protocols. The USPTO posts the file contents of issued patents and application publications on its website. The information covered under this information collection will not be released to the public, unless it is part of an issued patent or application publication, or unless one or more specific conditions for power to inspect or access are met pursuant to 37 CFR § 1.14(c)-(j). Patent applicants and/or their designated representatives can view the current status of their patent application through Patent Center.

The Privacy Act of 1974 (Pub. L. 93-579) requires that an applicant be given certain information in connection with the items covered under this information collection. The applicable Privacy Act System of Records Notice for this information collection is COMMERCE/PAT-TM-7 Patent Application Files (SORN 7), available at 78 FR 19243 (March 29, 2013).³ The purpose of SORN 7 is to disclose how the USPTO intends to use, maintain, and protect the information that it has collected to carry out the duties of

¹ <https://www.govinfo.gov/content/pkg/FR-2025-05-21/pdf/2025-09141.pdf>.

² <https://www.govinfo.gov/content/pkg/FR-2025-09-15/pdf/2025-17767.pdf>.

³ <https://www.govinfo.gov/content/pkg/FR-2013-03-29/pdf/2013-07341.pdf>.

the USPTO to examine patent applications and issue patents. SORN 7 manages all applicant records including name, citizenship, residence, post office address, and other information pertaining to the applicant's activities in connection with the invention for which a patent is sought or has been granted.

The information in SORN 7 is protected from disclosure to third parties in accordance with the Privacy Act until the application is published under 35 U.S.C. 122(b) or issued as a patent under 35 U.S.C. 153. Prior to application publication or patent issuance, the information in SORN 7 is protected from disclosure to third parties in accordance with the Privacy Act, except that disclosure is permitted for the following routine uses including, but not limited to: law enforcement in the event that the system of records indicates a violation or potential violation of law; a federal, state, local, or international agency, in response to its request; an agency, organization, or individual for the purpose of performing audit or oversight operations as authorized by law; non-federal personnel under contract to the agency; the Department of Justice for Freedom of Information Act (FOIA) assistance; a member of Congress working on behalf of an individual to whom the record pertains, when the individual has requested the member's assistance with respect to the subject matter of the record; the Office of Personnel Management (OPM) for personnel research purposes; and the Office of Management and Budget (OMB) for legislative coordination and clearance.

Categories of individuals covered by SORN 7 include applicants for patent, including inventors, legal representatives for deceased or incapacitated inventors, and other persons authorized by law to make applications for a patent.

11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.

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

12. Provide estimates of the hour burden of the collection of information. The statement should:

- **Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desirable. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the**

reasons for the variance. Generally, estimates should not include burden hours for customary and usual business practices.

- If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens.
- Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead, this cost should be included under 'Annual Cost to Federal Government'.

Table 3 calculates the 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 182,085 responses per year from 182,085 respondents for this information collection, with approximately 3% of these responses submitted by small entities.

- **Burden Hour Calculation Factors**

The USPTO estimates that it will take the public approximately 0.20 hours (12 minutes) to 1.5 hours (90 minutes) to complete this information collection. This includes the time to gather the necessary information, create the documents, and submit the completed item(s) to the USPTO. Using these burden factors, the USPTO estimates that the total respondent hourly burden for this information collection is 88,922 hours per year.

- **Cost Burden Calculation Factors**

The USPTO uses a professional rate of \$447 per hour for respondent cost burden calculations, which is the mean rate of intellectual property attorneys in private firms as shown in the 2023 Report of the Economic Survey published by the Committee on Economics of Legal Practice of the American Intellectual Property Law Association (AIPLA). The USPTO also uses a paraprofessional rate of \$134 per hour for respondent cost burden calculations, which is the average rate of paralegals as shown in the 2024 Utilization and Compensation Survey by the National Association of Legal Assistants (NALA).

Using these hourly rates, the USPTO estimates that the total respondent cost burden for this information collection is \$12,493,972 per year.

Table 3: Total Burden Hours and Hourly Costs to Private Sector Respondents

Item No.	Item	Estimated Annual Respondents	Responses per Respondent	Estimated Annual Responses (year)	Estimated Time for Response (hours)	Estimated Annual Burden (hour/year)	Rate ⁴ (\$/hour)	Estimated Annual Burden
		(a)	(b)	(a) x (b) = (c)	(d)	(c) x (d) = (e)	(f)	(e) x (f) = (g)
1	Power of Attorney to Prosecute Applications Before the USPTO PTO/AIA/80 PTO/SB/80	2,454	1	2,454	0.50 (30 minutes)	1,227	\$134	\$164,418
2	Power of Attorney or Revocation of Power of Attorney with a New Power of Attorney and Change of Correspondence PTO/AIA/82A PTO/AIA/82B PTO/AIA/82C	167,843	1	167,843	0.50 (30 minutes)	83,922	\$134	\$11,245,548
3	Patent – Power of Attorney or Revocation of Power of Attorney with a New Power of Attorney and Change of Correspondence Address PTO/AIA/81 PTO/SB/81 PTO/AIA/81A PTO/SB/81A	167	1	167	0.50 (30 minutes)	84	\$134	\$11,256
4	Reexamination – Patent Owner Power of Attorney or Revocation of Power of Attorney with a New Power of Attorney and Change of Correspondence Address PTO/AIA/81B PTO/SB/81B	75	1	75	0.50 (30 minutes)	38	\$134	\$5,092
5	Reexamination – Third Party Requester Power of Attorney or Revocation of Power of Attorney with a New Power of Attorney and Change of Correspondence Address PTO/SB/81C	71	1	71	0.50 (30 minutes)	36	\$134	\$4,824
6	Request for Withdrawal as Attorney or Agent and Change of Correspondence Address PTO/AIA/83 PTO/SB/83	3,659	1	3,659	0.50 (30 minutes)	1,830	\$447	\$818,010
7	Petition Under 37 CFR 1.36(a) to Revoke Power of Attorney by Fewer than All the Applicants	9	1	9	1 (60 minutes)	9	\$447	\$4,023
8	Petition to Waive 37 CFR 1.32(b)(4) and Grant Power of Attorney by Fewer than All the Applicants	9	1	9	1 (60 minutes)	9	\$447	\$4,023
9	Request for Customer Number Data Change PTO/SB/124A PTO/SB/124B	619	1	619	0.20 (12 minutes)	124	\$134	\$16,616
10	Request for Customer Number PTO/SB/125A PTO/SB/125B	5,789	1	5,789	0.20 (12 minutes)	1,158	\$134	\$155,172
11	Customer Number Upload Spreadsheet	110	1	110	1.50 (90 minutes)	165	\$134	\$22,110
12	Request to Update a PCT	1,280	1	1,280	0.25	320	\$134	\$42,880

⁴ 2023 Report of the Economic Survey, published by the Committee on Economics of Legal Practice of the American Intellectual Property Law Association (AIPLA); pg. F–41. The USPTO uses the average billing rate for intellectual property work in all firms which is \$447 per hour (<https://www.aipla.org/home/news-publications/economic-survey>).

2024 National Utilization & Compensation Report Executive Summary published by the National Association of Legal Assistants (NALA); pg. 2. The USPTO uses the average billing rate for paralegals/paraprofessionals, which is \$134 per hour (<https://nala.org/wp-content/uploads/2025/01/2024-NALA-Compensation-Utilization-Report-ExecSumm-FINAL-1-15-25.pdf>).

Item No.	Item	Estimated Annual Respondents	Responses per Respondent	Estimated Annual Responses (year)	Estimated Time for Response (hours)	Estimated Annual Burden (hour/year)	Rate (\$/hour)	Estimated Annual Burden
		(a)	(b)	(a) x (b) = (c)	(d)	(c) x (d) = (e)	(f)	(e) x (f) = (g)
	Application with a Customer Number PTO-2248				(15 minutes)			
	Totals	182,085	---	182,085	---	88,922	---	\$12,493,972

13. Provide an estimate for the total annual cost burden to respondents or record keepers resulting from the collection of information. (Do not include the cost of any hour burden already reflected on the burden worksheet).

- The cost estimate should be split into two components: (a) a total capital and start-up cost component (annualized over its expected useful life) and (b) a total operation and maintenance and purchase of services component. The estimates should take into account costs associated with generating, maintaining, and disclosing or providing the information. Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the time period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers and software; monitoring, sampling, drilling and testing equipment; and record storage facilities.
- If cost estimates are expected to vary widely, agencies should present ranges of cost burdens and explain the reasons for the variance. The cost of purchasing or contracting out information collections services should be a part of this cost burden estimate. In developing cost burden estimates, agencies may consult with a sample of respondents (fewer than 10), utilize the 60-day pre-OMB submission public comment process and use existing economic or regulatory impact analysis associated with the rulemaking containing the information collection, as appropriate.
- Generally, estimates should not include purchases of equipment or services, or portions thereof, made: (1) prior to October 1, 1995, (2) to achieve regulatory compliance with requirements not associated with the information collection, (3) for reasons other than to provide information or keep records for the government, or (4) as part of customary and usual business or private practices.

This information collection contains non-hour cost burdens in both fees paid by the public and associated postage costs for mailing items to the USPTO. The USPTO estimates that the total annual non-hour cost burden for this information collection, in the form of filing fees and postage, is \$26,155 per year.

Fees

There are two fees associated with submitting petitions to the USPTO for a total of \$5,760 per year as outlined in Table 4 below.

Table 4: Filing Fees

Item No.	Fee Code	Item	Estimated Annual Responses (a)	Filing Fee (\$) (b)	Non-hourly Cost Burden (a) x (b) = (c)
7	1462	Petitions Under 37 CFR 1.36(a) to Revoke Power of Attorney by Fewer than All the Applicants (undiscounted entity)	5	\$450	\$2,250
7	2462	Petitions Under 37 CFR 1.36(a) to Revoke Power of Attorney by Fewer than All the Applicants (small entity)	3	\$180	\$540
7	3462	Petitions Under 37 CFR 1.36(a) to Revoke Power of Attorney by Fewer than All the Applicants (micro entity)	1	\$90	\$90
8	1462	Petition to Waive 37 CFR 1.32(b)(4) and Grant Power of Attorney by Fewer than All the Applicants (undiscounted entity)	5	\$450	\$2,250
8	2462	Petition to Waive 37 CFR 1.32(b)(4) and Grant Power of Attorney by Fewer than All the Applicants (small entity)	3	\$180	\$540
8	3462	Petition to Waive 37 CFR 1.32(b)(4) and Grant Power of Attorney by Fewer than All the Applicants (micro entity)	1	\$90	\$90
		Totals	18	- - -	\$5,760

Postage Costs

Although the USPTO prefers that the items in this information collection be submitted electronically, responses may be submitted by mail through the United States Postal Service. The USPTO estimates that 1% of the 182,085 items will be submitted in the mail, resulting in 1,821 mailed items. The USPTO estimates that the average postage cost for a mailed submission, using a Priority Mail flat rate legal envelope, will be \$11.20. Therefore, the USPTO estimates the total mailing costs for this information collection at \$20,395.

14. Provide estimates of annualized costs to the federal government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information. Agencies may also aggregate cost estimates from Items 12, 13, and 14 in a single table.

The USPTO generally expects that a GS-5 employee will process submissions for this information collection. The USPTO is using the GS-5, step 1 rate for every IC line to estimate the annual cost to the federal government.

The USPTO estimates that the cost of a GS-5, step 1 employee is \$30.12 per hour (GS hourly rate of \$22.11 with 36.25% (\$8.01) added for benefits and overhead).

The USPTO estimates that it takes an employee between 0.20 hours (12 minutes) and 1 hour to process the information in this information collection.

Table 5 calculates the burden hours and costs to the federal government for processing this information collection.

Table 5: Burden Hour/Cost to the Federal Government

Item No.	Item	Estimated Annual Responses (a)	Estimated Burden Hours (b)	Estimated Hourly Burden (a) x (b) = (c)	Rate ⁵ (\$/hr) (d)	Total Federal Government Cost (c) x (d) = (e)
1	Power of Attorney to Prosecute Applications Before the USPTO	2,454	0.25 (15 minutes)	614	\$30.12	\$18,494
2	Power of Attorney or Revocation of Power of Attorney with a New Power of Attorney and Change of Correspondence	167,843	0.25 (15 minutes)	41,961	\$30.12	\$1,263,865
3	Patent – Power of Attorney or Revocation of Power of Attorney with a New Power of Attorney and Change of Correspondence Address	167	0.25 (15 minutes)	42	\$30.12	\$1,265
4	Reexamination – Patent Owner Power of Attorney or Revocation of Power of Attorney with a New Power of Attorney and Change of Correspondence Address	75	0.25 (15 minutes)	19	\$30.12	\$572
5	Reexamination – Third Party Requester Power of Attorney or Revocation of Power of Attorney with a New Power of Attorney and Change of Correspondence Address	71	0.25 (15 minutes)	18	\$30.12	\$542
6	Request for Withdrawal as Attorney or Agent and Change of Correspondence Address	3,659	0.25 (15 minutes)	915	\$30.12	\$27,560
7	Petition Under 37 CFR 1.36(a) to Revoke Power of Attorney by Fewer than All the Applicants	9	1	9	\$30.12	\$271
8	Petition to Waive 37 CFR 1.32(b)(4) and Grant Power of Attorney by Fewer than All the Applicants	9	1	9	\$30.12	\$271
9	Request for Customer Number Data Change	619	0.20 (12 minutes)	124	\$30.12	\$3,735
10	Request for Customer Number	5,789	0.20 (12 minutes)	1,158	\$30.12	\$34,879
11	Customer Number Upload Spreadsheet	110	0.42 (25 minutes)	46	\$30.12	\$1,386

⁵ https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2025/DCB_h.pdf.

Item No.	Item	Estimated Annual Responses (a)	Estimated Burden Hours (b)	Estimated Hourly Burden (a) x (b) = (c)	Rate (\$/hr) (d)	Total Federal Government Cost (c) x (d) = (e)
12	Request to Update a PCT Application with a Customer Number	1,280	0.25 (15 minutes)	320	\$30.12	\$9,638
	Totals	182,085	- - -	45,235	- - -	\$1,362,478

15. Explain the reasons for any program changes or adjustments reported on the burden worksheet.

Table 6: ICR Summary of Burden

	Requested	Program Change Due to New Statute	Program Change Due to Agency Discretion	Change Due to Adjustment in Agency Estimate	Change Due to Potential Violation of the PRA	Previously Approved
Annual Number of Responses	182,085	0	0	-44,488	0	226,573
Annual Time Burden (Hr)	88,922	0	0	-22,181	0	111,104
Annual Cost Burden (\$)	24,698	0	0	-1,157	0	25,855

Changes in Collection Since Last Renewal

One nonsubstantive change request (change worksheet) was filed since the last renewal. The change worksheet was submitted to OMB in November 2024. In this worksheet, the USPTO changed the amount of the fee codes to comply with rulemaking RIN 0651-AD64 (Setting and Adjusting Patent Fees During Fiscal Year 2024).

Change in Responses and Hourly Burden due to Adjustment in Agency Estimate

The total number of responses has decreased by 44,488 due to estimated fluctuations in the number of respondents/submissions in this information collection. This decrease in the number of respondents and responses results in a decrease of 22,181 hours in the annual time burden estimates.

Change in Annual Non-hour Costs due to Adjustment in Agency Estimate

For this renewal, the USPTO estimates that the total annual non-hour costs will decrease by \$1,157 from the previous approval. This decrease is due to estimated fluctuations in submissions for items that require a fee.

16. For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including

beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.

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

17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

The forms in this information collection will display the OMB Control Number and the expiration date of OMB approval.

18. Explain each exception to the topics of the certification statement identified in “Certification for Paperwork Reduction Act Submissions.”

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.