<!DOCTYPE html>
<html>
<head>
	<meta http-equiv="content-type" content="text/html; charset=utf-8"/>
	<title></title>
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	<meta name="created" content="00:00:00"/>
	<meta name="changed" content="00:00:00"/>
	<style type="text/css">
		h2.cjk { font-family: "Noto Sans" }
		h2.ctl { font-family: "Noto Sans Devanagari" }
	</style>
</head>
<body lang="en-US" dir="ltr">
<table cellpadding="2" cellspacing="2" style="page-break-before: always">
	<tr>
		<td style="border: none; padding: 0in"><h1>PUBLIC SUBMISSION</h1
>
		</td>
		<td width="5%" style="border: none; padding: 0in"> As of:
			6/29/26, 9:14 AM
Received: June 26, 2026
Status:
			In_Review
Tracking No. mqv-luc3-x9es
Comments
			Due: June 26, 2026
Submission Type: API
		</td>
	</tr>
</table>
Docket: PTO-P-2026-0331
0651-0089 DOCX Submission
Requirements

Comment On: PTO-P-2026-0331-0001
Agency Information
Collection Activities; Proposals, Submissions, and Approvals: DOCX
Submission Requirements

Document: PTO-P-2026-0331-DRAFT-0013
Comment by
Anonymous

<hr/>

<h2 class="western">Submitter Information</h2>
Name: Anonymous Anonymous

<hr/>

<h2 class="western">General Comment</h2>
RE: Agency Information Collection Activities; Proposals,
Submissions, and Approvals: DOCX Submission Requirements - 0651-0089
DOCX Submission Requirements
Posted by the Patent and Trademark
Office on Apr 27, 2026
Document ID: PTO-P-2026-0331-0001

The

burden is unequal:
The burden of docx filing is not fairly or
evenly distributed and it can impose a much greater burden on small
or disadvantaged applicants. I work at a small IP firm with 10-20
patent attorneys. We have paid to have access to Microsoft brand
products including Word. Access or subscriptions can commonly cost
about $500 per person, so this is a non-negligible impact (it is
assumed that both staff and attorneys would need access to the
software). When I draft an application myself using Microsoft Word, I
rarely encounter upload issues. However, we also work with foreign
associates who provide documents for us to file, and we work with
small inventors who initially want to do some of their own drafting
and have us do just a final review. And sometimes we are filing a
continuation or divisional that is transferred in and only a pdf is
available.
Received documents are sometimes problematic and the
USPTO Patent Center system fails to upload those or provide
sufficient guidance to fix the problems. Last month, another attorney
and I both spent about an hour-and-a-half troubleshooting a single
filing when the DOCX version would upload initially but generated
errors that prevented it from being accepted. We had opened it in
Word, saved it in word, inspected it with word tools and attempted to
remove all metadata and much formatting, however the problem
persisted. (It may have related to bookmarks, error code 2022 which
prevents proceeding, rather than error code 4003 which merely
notifies that bookmarks will be removed; error code 2022 does not
tell you where in the lengthy document the problem can be found, it
just prevents you from uploading the document). The USPTO estimate
for time per application may be significantly underestimating the
burden, particularly for firms that either don’t use Microsoft
brand Word or who receive a high percentage of document from entities
that don’t draft the document in Word. It is also likely an
underestimate in fields that use more symbols, Greek letters,
subscripts, superscripts, formulas, and other non-standard
characters, which are quite common in some technological fields.
The
burden is too high:
The DOCX surcharge is unreasonably high.
Given that a few years ago, the USPTO itself estimated its cost of
doing optical character recognition of pdf submissions at about three
or four dollars per application, it seems unreasonable that the
Patent Office charges a surcharge that is 100 times greater than
their actual cost.
The burden is unnecessary:
It is not
clear why the Patent Office doesn’t just allow pdfs with fonts and
readable text like almost every other court and federal agency does.
It would be nice if either PDF or DOCX were accepted with no
surcharge.
-Anonymous small firm registered patent attorney,
submitted June 26, 2026
</p>
</body>
</html>