



American Intellectual Property Law Association

August 19, 2024

The Honorable Kathi Vidal
Under Secretary of Commerce for Intellectual Property
and Director of the United States Patent and Trademark Office
600 Dulany Street
Alexandria, VA 22314
Via the Federal eRulemaking Portal at www.regulations.gov (Docket No. PTO-T-2024-0016)

RE: Withdrawal of Changes to the Post Registration Response Deadlines

Dear Director Vidal:

The American Intellectual Property Law Association (AIPLA) is pleased to comment on the Office's recent Withdrawal of Changes to Post Registration Response Deadlines.

AIPLA is a national bar association of approximately 7,000 members, who include professionals engaged in private or corporate practice, in government service, and in the academic community. AIPLA members represent a wide and diverse spectrum of individuals, companies, and institutions involved directly or indirectly in the practice of patent, trademark, copyright, trade secret, and unfair competition law, as well as other fields of law affecting intellectual property. Our members represent both owners and users of intellectual property. Our mission includes helping establish and maintain fair and effective laws and policies that stimulate and reward invention while balancing the public's interest in healthy competition, reasonable costs, and basic fairness.

AIPLA writes in support of the USPTO's Withdrawal of Changes to Post Registration Response Deadlines. AIPLA previously submitted comments opposing the application of flexible response periods to post-registration trademark Office Actions.

While the reasoning for the current withdrawal is unclear, AIPLA is pleased with the decision and hopes that the public comments opposing the implementation of the proposed deadline changes were helpful in the Office's decision making. AIPLA understands that many Office proposals reflect an effort to increase the Office's efficiency and to reduce pendency of processing filings. AIPLA encourages the Office to conduct data analyses to ensure that any changes will have their intended effect and merit the time-consuming rulemaking process.

AIPLA appreciates the opportunity to provide these comments and is pleased to express its support of the Office's decision not to institute changes to post-registration response deadlines.

Sincerely,

A handwritten signature in blue ink that reads "Anne M. Muetting". The signature is written in a cursive style with a large, looped initial "A" and "M".

Anne Muetting

President

American Intellectual Property Law Association