

From: Christine Bekelja
To: [Fee.Setting](#)
Subject: Proposed Fee for Non-Docx Applications
Date: Tuesday, August 14, 2018 10:10:13 AM

Dear Sirs,

I am kindly requesting reconsideration of any fee that would be imposed on non-.docx filings. While filing electronically has a huge benefit for everyone, forcing everyone to use Microsoft Word for filings is not mutually beneficial and requires more work on the filer. The introduction of this .docx penalty creates more opportunity for errors and less security for the inventors that have signed the declaration while the application was in one format. From a law firm administrator's perspective, the .docx filings were not something I would pursue.

First, the .docx file is turned into a PDF document upon filing. After the document is turned into a PDF, then the filer must check the document again to make sure no errors were introduced when the document was converted BACK TO PDF by the USPTO. If we upload a PDF document, no additional review is required, and our document matches the document we wanted to file. Second, if during the review of the USPTO converted documents errors were not found, then it potentially causes problems down the line. Third, when the declaration is signed with a copy (PDF) of the application that is to be filed, the inventors know exactly what is being filed. Often, even if something as simple as pagination changes, inventors want to know why. There is no need for this additional step that could cause concern for our clients.

Also, given the state of PDF software today, if the USPTO would like a .docx version of something that was filed, it is a couple mouse clicks away, when needed. PDF software allows documents that can be searched and text that can be copied. There is no benefit to filing a .docx version that is not already available to the USPTO. Maybe what needs to happen is that the USPTO software should automatically create readable PDF documents where the text can be captured, rather than forcing law firms to create documents that suit the USPTO's antiquated systems.

Rather than wasting time with this type of change (.docx enforcement), perhaps the USPTO should make the text in their actions that are issued, readable, instead of making every law firm OCR their documents. While doing this, the USPTO could also eliminate special PDF settings (the job file) or enforcing the use of Adobe products.

While we appreciate the USPTO taking steps to improve things, we do not see filing .docx documents as an improvement. I think this is a common opinion, which is why no one wants to file .docx documents. When the .docx program rolled out, the trial group, and the request for people to use it, we opted against it for very good reasons (some of those mentioned).

If you should have any questions about my feedback, please let me know. This is from my personal perspective, as a person who has worked in IP administration since 1989, and is currently an IP law firm administrator.

Best regards,

Christine Bekelja

Christine Bekelja (Ms.)
Firm Administrator



Rossi, Kimms & McDowell LLP
20609 Gordon Park Square, Suite 150
Ashburn, VA 20147
Phone: 703-726-6020
Facsimile: 703-726-6024
Email: christinebekelja@rkmlp.com
www.rkmlp.com

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