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Setting and Adjusting Patent Fees

Comment On: PTO-P-2018-0031-0001
Setting and Adjusting Patent Fees During Fiscal Year 2020

Document: PTO-P-2018-0031-0017
Comment Judith Szepesi

Submitter Information

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General Comment

I am writing to oppose the proposed \$400 surcharge for filing in PDF rather than DOCX format.

As a small firm attorney, I work with a lot of start-ups. Because working on patents is already complex, I allow my clients choose the tools they prefer for editing their patent applications.

I have drafted patent applications in Microsoft Word, LibreOffice, LaTeX, GoogleDocs, PowerPoint, Notepad, Apple Pages, and physical paper which was scanned for submission. Each of these approaches has a simple way to produce a PDF, while maintaining all text, special characters, equations, and formulas.

However, converting between these formats can cause issues. Requiring us to convert a patent application from LaTeX to DOCX for submission is likely to introduce errors especially into complex equations, tables, and other formatted text. Similarly, conversion from Pages will sometimes introduce errors in the special characters and formatting. PowerPoint does not have a way to convert, so we would need to cut and paste elements individually into a Word Document. This would be time consuming and error prone. Additionally the manual review and comparison of the DOCX to the original document is time consuming, and thus expensive.

Furthermore, requiring a subscription to Microsoft Word to produce DOCX files or pay a significant surcharge would impact especially individual inventors and start-ups, who are the least able to afford it.

Please remove this new requirement from the rule making.

Thank you.