



January 14, 2022

David Gooder
 Commissioner for Trademarks
 U.S. Patent and Trademark Office
 P.O. Box 1451
 Alexandria, VA 22313-1451

Via www.regulations.gov

Dear Commissioner Gooder,

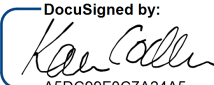
Intellectual Property Owners Association (“IPO”) submits the following comments and suggestions in response to the USPTO’s request for comments titled “USPTO To Begin Issuing Electronic Trademark Registration Certificates,” 86 Fed. Reg. 71249 (Dec. 15, 2021).

IPO understands that trademark owners will be able to view, download and print a complete copy of the trademark registration certificate at no charge at any time. In addition, the electronic trademark issuance process would permit the USPTO to issue trademark registrations approximately one to two weeks faster than the current paper process. IPO applauds the USPTO for continued, significant efforts towards electronic processing of trademark applications and this latest proposed change that will make registration certificates more easily accessible to trademark owners earlier, with no possibility that the certificate will be lost in transit.

The USPTO’s request indicates that the current printing process for trademark registration certificates is “costly and time-consuming. Each registration certificate must be reviewed by a team of in-house contractors, printed on special paper and then mailed to customers.” Indeed, the USPTO plans to change trademark owners who file an initial application on or after the implementation date a \$25 fee to obtain a presentation copy of the registration certificate. IPO is hopeful that, upon implementation of this change, the revenue represented by this cost savings is either used to assist in clearing the current trademark backlog or is reflected in an appropriate reduction in trademark application fees.

We thank you for considering these comments and welcome any further dialogue or opportunity to provide additional information to assist your efforts.

Sincerely,

DocuSigned by:

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 President

President
Karen Cochran
 Shell Oil Company

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