



January 20, 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 "Trademarks Administrative Sanctions Process," 87 FR 431 (Jan. 1, 2022). We appreciate that protecting the integrity of the U.S. trademark register is of primary concern to the United States Patent and Trademark Office. As a result, the USPTO has established an administrative process for investigating submissions to the USPTO in trademark matters that appear to violate the Trademark Rules of Practice and imposing sanctions as appropriate. To promote transparency regarding the sanctions process for applicants or registrants who may be impacted by sanctions as well as interested third parties, the USPTO plans to place documents associated with the process in the electronic file record of impacted applications or registration, and therefore available for viewing by the public in the USPTO Trademark Status and Document Retrieval (TSDR) database.

IPO shares the USPTO's interest in the integrity of the U.S. trademark register and supports the USPTO's efforts to take appropriate action with respect to improper submissions. Transparency regarding the sanctions process will be helpful for trademark owners, both in monitoring the status of their own trademark filings and in researching potential attorney representatives and the status of other relevant trademarks that may be subject to the sanctions process.

Currently, however, the search capabilities of TSDR are limited, and it is not possible to search TSDR for records in which an order to show cause or sanction has issued. In other words, one can locate a copy of an order to show cause or sanction order only after identifying the relevant application or registration number to which the order applies. For full transparency, trademark owners must be able to search the USPTO's records and determine for which registrations and applications orders to show cause or orders for sanctions have issued.

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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