

25 August 2016

Mr. Nicholas Fraser
Desk Officer, U.S. Patent and Trademark Office
Office of Information and Regulatory Affairs
Office of Management and Budget
Washington, DC 20503

By email: Nicholas_A_Fraser@omb.eop.gov, subject “0651–0031 30-day comment”

Re: U.S. Patent and Trademark Office, *Patent Processing (Updating) 0651-0031, comment request*, 81 Fed. Reg. 48762 (July 26, 2016), www.gpo.gov/fdsys/pkg/FR-2016-07-26/pdf/2016-17699.pdf, commenting on Control Number 0651-0031 ICR 201607-0651-002, www.reginfo.gov/public/do/PRAViewICR?ref_nbr=201607-0651-002

Dear Mr. Fraser:

IEEE-USA submits these comments on the above-captioned 30-day Notice published pursuant to the Paperwork Reduction Act (44 U.S.C. §3501 *et seq.*, “PRA”). IEEE-USA is the United States unit of the IEEE, the world’s largest professional association for technological professionals, representing approximately 200,000 individuals, largely electrical, software, electronic, mechanical, and biomedical engineers, working in thousands of companies from the largest and most-established to the smallest and newest. IEEE-USA seeks to represent the interests of its members, their careers, and their ability to create the next generation of America’s companies and jobs. Efficient operation of the patent system is one of the keys to that future.

IEEE-USA has enormous respect for the U.S. Patent and Trademark Office (USPTO), its leaders and its employees, for their professionalism and for their extensive and significant contributions to our innovation economy. Management of the most important part of the U.S. patent system is a large and complicated undertaking, and IEEE-USA appreciates the challenges that USPTO faces continually in executing its charter. We respectfully submit however, that the U.S. patent system would operate more efficiently if USPTO improved its compliance with the law by minimizing its paperwork burden on the public.

The USPTO submitted the above-captioned request for OMB approval before the first 60-day public comment period on this request had ended. Furthermore, the USPTO submission included an incomplete Supporting Statement which did not contain analysis of, or responses to the public comments, including those which IEEE-USA submitted. IEEE-USA urges OMB to conclude this pending request as improperly submitted, and return it to USPTO so that the agency can (a) fully digest the public’s input, (b) act on such input proposals to reduce unnecessary paperwork burden, (c) respond substantively to the public comments in a new and complete Supporting Statement submitted to OMB, and (d) restart the second (30-day) comment period to allow the public to comment on the complete Supporting Statement.

IEEE-USA thanks OMB for considering these comments and would welcome any further discussions with USPTO and OMB on these matters. IEEE-USA wants USPTO to succeed in its mission and believes that compliance with the procedures of the Paperwork Reduction Act is essential for that success.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'P. Eckstein', with a long horizontal flourish extending to the right.

Pete A. Eckstein, 2016 President
IEEE-USA