

From: [Suzann Moskowitz](#)
To: [TM FR Notices](#)
Subject: Trademark Fee Proposal Comments
Date: Monday, September 30, 2019 11:20:37 PM

To whom it may concern,

I have practiced trademark law since 2004 and work with a variety of clients. Though many would not be affected significantly by fee changes, I believe that the proposals would be very detrimental to my startup clients.

In short, because there is no microentity designation on the TM side of the USPTO, smaller companies would be at a huge disadvantage when it comes to things like Letters of Protest, extensions, and RFRs, tools which they rely upon to protect and defend their portfolios.

Increasing the cost of items like these would likely increase the number of abandoned/refiled applications as well as full-blown disputes, all of which can drain USPTO resources.

The need for increased revenue is understandable, but increasing these particular line items would be very detrimental.

Best,
Suzann

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