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To: Information Collection
Cc: Berridge, William P.
Subject: 0651-0051 Comment

The following comments are provided by the law firm of Oliff & Berridge, PLC in response to the Request for Comments on the proposed collection, published at 77 Fed. Reg. 1917.

Oliff & Berridge appreciates the opportunity to have its position considered by the USPTO. Oliff & Berridge is an intellectual property law firm that represents hundreds of trademark applicants, many of whom file under the Madrid Protocol. The following comments reflect its experience with such applicants, but is not intended to represent the position of any one or group of such applicants.

Oliff & Berridge strongly supports the USPTO's proposal to add to its electronic forms the Combined Declaration of Continued Use/Excusable Nonuse and Incontestability Under Sections 71 and 15. Many of our clients filing their first Section 71 Declaration of Continued Use also simultaneously file a Declaration of Incontestability under Section 15. We estimate that an electronic combined declaration form will reduce the time necessary to prepare and file such declarations, and will thus provide a cost savings to our clients.

Thank you for the opportunity to present comments on the proposed collection.

Respectfully submitted,

/William P. Berridge/
Oliff & Berridge, PLC

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