

One Hundred Seventy-Eight Members of the Patent Center Listserv

By email and by Priority Mail 9405830109355026723875

Kathi Vidal, Director
USPTO
P O Box 1450
Alexandria, VA 22313

By email and by Priority Mail 9405830109355026723868

Peggy Gustafson, Inspector General
Department of Commerce
1401 Constitution Avenue NW
Washington, DC 20230

September 29, 2023

Dear Director Vidal and Inspector General Gustafson:

This is an urgent matter for your personal attention. We write to ask that decommissioning of the USPTO's two main software systems for patent applicants, Private PAIR and EFS-Web, currently announced for November 8, 2023, be delayed until Patent Center is complete and robust. These software systems are the USPTO's primary interface, critical-path linchpins for the entire US patent system. This letter identifies a number of individual defects in the Patent Center software. The pattern of software defects suggests something larger and more important—defects in the USPTO's software development process. We suggest that the USPTO's current process trajectory cannot bring Patent Center to acceptable functionality or quality in six weeks. These issues require your personal attention, and cannot be delegated.

Regardless of what you may have been told, Patent Center is not working correctly and has not come close to replicating the functionality of the USPTO's current software systems, Private PAIR and EFS-Web, which it is supposed to replace. The shutdown of Private PAIR and EFS-Web (currently announced for November 8, 2023) will seriously hamper American inventors' and applicants' ability to file and prosecute patent applications before the PTO, causing potentially irreparable harm and loss of rights to American inventors and applicants across the spectrum.

In summary, and as explained in detail in this letter:

- Patent Center has long-known bugs that prevent certain kinds of filings.
- Patent Center does not replicate the functionality of Private PAIR or EFS-Web.
- Patent Center is unreliable and provides no backup (we rely upon Private PAIR and EFS-Web as the backup).
- Patent Center is not fully usable on all browsers.

- Patent Center’s design and implementation ignore the needs and requirements of actual users.

Who we are:

The 178 signatories of this letter are patent attorneys, agents, and assistants who actually use Patent Center, Private PAIR, and EFS-Web in our daily work to represent patent applicants. Most of us are members of a group of users of the Patent Center system called the Patentcenter Listserv. The signers of this letter, either directly or through our firms or corporations, have in the past decade paid over ninety million dollars to the USPTO in fees. The signers of this letter, either directly or through our firms or corporations, have in the past decade prosecuted over one hundred thousand US patents to issuance.

Discussion:

Our group alone has documented substantial failures, flaws, and omissions of essential functionality in Patent Center and has routinely provided the USPTO with this information. Rather than fix glaring problems and omissions, the USPTO has categorized most of them as “feature requests” and has not acted on most of them.

As described below, there are more than eighty such failure reports presently outstanding, any of which may prevent an applicant from making or completing a filing at the USPTO. There are more than forty “feature requests” presently outstanding, none of which the USPTO has acted upon.

We are astonished and concerned at the USPTO’s announcement on September 20, 2023 that the USPTO plans to shut down Private PAIR and EFS-Web on November 8, 2023. Shutting down the older, reliable Private PAIR and EFS-Web would leave the patent community with only the buggy Patent Center system. This would be a catastrophic mistake. As we will explain in some detail below, Patent Center is not even close to being a usable production system that would sufficiently fill the functions necessary for filing and prosecuting patent applications. Essential functions are not implemented in Patent Center, and many of the implemented features are unreliable. Our list of work-blocking bugs is at <https://patentcenter-tickets.oppedahl.com/> and a compilation of articles discussing the bugs is at <https://blog.oppedahl.com/?cat=21>. Patent Center may at some future date be ready for general release as a production system, but no amount of wishful thinking can support a conjecture that completeness and reliability will settle on Patent Center by November 8, 2023.

Many of us were signers of the letter dated December 16, 2021 from Seventy-Four Members of the Patent Center Listserv to Drew Hirshfeld about the unacceptable reliability of Patent Center as it stood in 2021. A copy is attached as [Exhibit A](#). Regrettably, the USPTO failed to respond meaningfully to that letter.

As we regularly communicate to Richard Seidel, Jamie Holcombe, and Greg Vidovich, we maintain a list of bugs in Patent Center that have blocked the ability to get necessary work done, <https://patentcenter-tickets.oppedahl.com/>. The number of outstanding Patent Center work-blocking bugs presently exceeds eighty. Though the USPTO has made some progress over years, many work-stopping bugs remain unaddressed, and many of them have been outstanding for more than a year. We also maintain a list of Patent Center feature requests on the web site. The number of feature requests presently exceeds forty. As best we can see, the USPTO has not implemented even a single one of the

feature requests. We have also accumulated a list of good things about Patent Center, and this list is also provided on the website. Nothing would delight us more than if this relatively short list of good things could grow longer, perhaps in part as a result of future cooperation between the USPTO and our group of users of Patent Center.

The USPTO must do several things immediately to avoid significant harm to American inventors, applicants, and the patent community.

- The USPTO should immediately publish a notice retracting the November 8 date for the shutdown of Private PAIR and EFS-Web. In the past, the USPTO has waited until the last minute (as little as 3 days) to announce delays of harmful or ill-advised software changes. That kind of abrupt stop/start imposes substantial costs on the patent community. The probability that Patent Center can achieve acceptable feature completeness, let alone reliability, by November 8 is zero. It is unfair to applicants to ask them prepare for a conversion that cannot possibly go smoothly, only to retract it when reality breaks through at the eleventh hour to those to whom reality is a threat. The retraction should be immediate. Private PAIR and EFS-Web should not be decommissioned until a consensus of users says Patent Center is ready. Based on the USPTO's consistent and demonstrated lack of willingness to correct serious bugs that, absent the availability of Private PAIR and EFS-Web, could easily cause applicants to lose rights, it seems that USPTO staff do not have a sound understanding of what is important and do not have the ability to set exit criteria wisely, and to the degree we can observe, don't maintain a reliable bug tracking system to know when those exit criteria are met. To say this as clearly as possible, given that somebody within the USPTO reached the view that Patent Center was ready to replace Private PAIR and EFS-Web, but was completely wrong to think so (and actually selected shutdown dates for the existing systems), this means that the USPTO cannot be trusted to decide this important thing. It is the users who actually know how to figure out whether Patent Center is ready to replace Private PAIR and EFS-Web, and you are hearing from users now. Any eventual shutdown of Private PAIR and EFS-Web needs to be scheduled only in consultation with users. One way to measure how close the Patent Center developers are to being able to shut down Private PAIR and EFS-Web will be to look at the bug list at <https://patentcenter-tickets.oppedahl.com/> and to see whether all of the "Open Issues" bugs have some day been reclassified as "Resolved Issues".
- The USPTO should resume regular meetings with members of the Patent Center listserv to discuss the outstanding Patent Center defects and Patent Center feature requests. We requested this in our December 16, 2021 letter to Mr. Hirshfeld. On July 11, 2023 we sent an email to Assistant Commissioner Greg Vidovich, identifying at least five bugs that block applicants' ability to get their work done. A copy of that email is attached as [Exhibit B](#). We did not hear back from him. We sent a reminder to Mr. Vidovich about this by email and voicemail message on September 18, 2023. Even after these reminders, we still did not hear back from him. We look forward to your arranging for the USPTO to resume these regular meetings with us.

The USPTO has claimed that "Patent Center has 100% of the functionality of EFS-Web, Public and Private PAIR." This is false. We wrote to you in an email message dated June 9, 2023, giving eleven examples of functions in Private PAIR and EFS-Web that Patent Center did not fully provide. A copy of that email is attached as [Exhibit C](#). We did not hear back from you in response to that email message. At least nine of those failings remain outstanding today.

If the only failings of Patent Center were that it has many bugs (which it does) and that it fails to provide 100% of the functionality of Private PAIR and EFS-Web (which indeed it fails to do), those failings alone would mandate a deferral of the shutdown of Private PAIR and EFS-Web. But it is worse than that. Many recent software updates to Patent Center have made things worse instead of better and suggest to us (many of whom have substantial experience with sophisticated software) that the PTO's software development processes are probably less than adequate. We can always tell when a new version of Patent Center software is released — over the course of the next two or three days, members of our email listservs alert each other to the new bugs that have been introduced into the system. To give just a few examples:

- The Patent Center software updates of March 17, 2023, gave rise to degradations or failures of several functions, as detailed in trouble tickets [CP104](#) (outgoing correspondence table lists “page 2 of 1”), [CP105](#) (restfulness failure for important links), [CP109](#) (responsiveness failure for correspondence table page), [CP110](#) (column sorting in tables becomes inconsistent from one table to the next), [CP113](#) (system-generated file names for “print to PDF” versions of important pages were previously distinct and thus useful but are now identical and thus useless) and [CP114](#) (PCT application number which could previously be copied and pasted is now impossible to copy and paste).
- A Patent Center software update on about September 15, 2023, deleted the ability of a user to see the customer's docket number in displayed lists of applications. As you might guess, almost all patent practitioners track applications by their own docket number, not the USPTO's application number, so this makes several aspects of Patent Center all but useless. This has been broken and corrected before (trouble tickets [CP90](#) and [CP91](#), January 17, 2023; trouble ticket [CP108](#), March 19, 2023; trouble ticket [CP148](#), August 28, 2023), and now it is broken again (trouble ticket [CP151](#), September 18, 2023) — which suggests that Patent Center's software testing processes are probably inadequate. In a USPTO Patent Center webinar training event on September 19, 2023, the USPTO presenter admitted this bug and said it would not be corrected until “sometime in October.”
- A Patent Center software update on about September 20, 2023, broke the application data display for every US design patent application that is a US designation from a Hague application (“35-series applications”) so that the “International Registration Number (Hague)” information is incorrect. Patent Center now lists only incorrect information in this field. The only way to get accurate information for this field is to use the system scheduled to be shut down on November 8, 2023 – Private PAIR. This is trouble ticket [CP155](#).

As mentioned above, many important features required for the filing and prosecution of patent applications are either missing from Patent Center, or have work-blocking bugs:

- EFS-Web correctly checks for possible duplicate national-stage entry attempts from a single PCT application. Patent Center fails to do so. This is trouble ticket [CP99](#).
- EFS-Web correctly permits uploading of sequence listings in ST.25 format. Patent Center fails to do so. This is trouble ticket [CP153](#).

- For a US design patent application that is a US designation from a Hague application (a “35-series application”), Patent Center fails to provide the web-based Corrective ADS function. This is trouble ticket [CP101](#).
- For a US design patent application that is a US designation from a Hague application (a “35-series application”), Patent Center fails to provide the web-based Issue Fee payment (Form 85B) function. This is trouble ticket [CP49](#).
- Patent Center fails to provide the web-based Corrective ADS function for a US national-stage entry from a PCT application. This is trouble ticket [CP102](#).
- Patent Center fails to provide the web-based Corrective ADS function for a provisional patent application. This is trouble ticket [CP98](#).
- The “sponsorship” feature that allows attorneys and their assistants to hand work back and forth works for some tasks, but not for other tasks.

Patent Center is dependent on other failure-prone components. All too often in recent months, Patent Center has been (for practical purposes) unavailable for periods of time during peak working hours because some other component (for example the fee payment system or the system for authenticating user logins) is down. There have been times when EFS-Web is still up and working when Patent Center is down; given the absence of a contingency backup for Patent Center, EFS-Web is still needed.

As we told the USPTO in our December 16, 2021 letter to Drew Hirshfeld, the PTO’s bug reporting software, IdeaScale, fails at its purported purpose. It is absurdly difficult to use, having remarkably and needlessly stringent password rules, 24-hour lockouts, and the like. If a user does succeed in getting a bug reported, the human response from the USPTO is often dismissive — USPTO staff close bugs as “not reproducible” without ever contacting the reporting party, staff notes in IdeaScale mischaracterize the bug in ways that ensure it will never be addressed, and other utter non sequiturs are common. Both the software and human components of the USPTO’s defect tracking systems seem intentionally designed to discourage reporting of bugs, and to avoid surfacing crucial information up the reporting chain. Among patent practitioners, IdeaScale is often accurately characterized as “where good ideas go to die.” (If your staff are telling you that there is a low rate of defect reporting, we suggest that that is more likely the product of sample bias than genuine software quality.) Reporting of Patent Center bugs to the Electronic Business Center is no better. We have opened many dozens of EBC trouble tickets for work-blocking bugs in Patent Center, as detailed at <https://patentcenter-tickets.oppedahl.com>, and we have never heard back from the EBC about the disposition of even a single ticket.

Patent Center is not fully usable on all screen sizes and browsers or computer systems. On our email listservs, there are frequent comments from users who are unable to use Patent Center on one or other browser or computer system. The observable behavior suggests deficiencies in the USPTO’s testing procedures — failure by USPTO people to test using computer systems, browsers and screen sizes that are actually used by many users.

Considering the many recent times that the USPTO’s efforts to update the Patent Center software have made things worse instead of better, we worry that even if the USPTO were to intensify its efforts during the next few weeks to correct the many dozens of outstanding Patent Center trouble tickets, the

likelihood is that, as in the past, the intensified pace of software changes will introduce even more new bugs and defects between now and November 8, 2023. This is yet another reason to defer the planned shutdown of Private PAIR and EFS-Web.

A number of signatories of this letter have conducted pre-release readiness reviews for their own software projects, some for software used by Boeing to design passenger aircraft. We suggest we may be able to assist the Patent Center developers in improving the USPTO's engineering, quality, and readiness review process.

USPTO's goal of developing Patent Center to provide all of the functions of PAIR and EFS-Web is still a long way off. Our listserv was established, first, for users to warn each other of bugs and secondarily, to gather intelligence to assist the USPTO toward a Patent Center that gets the necessary job done. USPTO's goal of correcting the outstanding flaws and deficiencies in Patent Center is likewise a long way off. This goal of the USPTO is stymied by the reluctance of the USPTO's software staff to receive and use the information we offer to them. We hope the USPTO would realize that it can better serve its own goals by accepting our offers of help rather than by rebuffing them. Let's work together in the coming weeks and months on our shared goals for Patent Center.

To reiterate, this is an urgent matter. Patent Center is not working correctly and has not come close to replicating the functionality of Private PAIR and EFS-Web. The USPTO's current software processes cannot bring Patent Center to an acceptable level of functionality and reliability on the time set by the USPTO. The planned shutdown of Private PAIR and EFS-Web will seriously hamper American inventors and applicants' ability to file and prosecute patent applications before the PTO, causing potentially irreparable harm and loss of rights to American inventors across the spectrum.

Deliverables may be emailed to, and questions may be directed to, Carl Oppedahl, carl@oppedahl.com, at +1-303-252-8800.

Respectfully submitted,



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Exhibit A

Seventy-four Members of the Patentcenter Listserv

By Priority Mail 9405503699300103672653

Drew Hirshfeld
Performing the functions and duties of the Under Secretary of Commerce for Intellectual Property and
Director of the USPTO
USPTO
P O Box 1450
Alexandria, VA 22313-1450

December 16, 2021

Dear Mr. Hirshfeld:

We write to you as members of the Patentcenter listserv. The Patentcenter listserv is a group of users of the Patentcenter system. Most of us are registered patent practitioners. The signers of this letter, either directly or through their firms or corporations, have paid over seventy-two million dollars to the USPTO in fees over the past ten years. The signers of this letter, either directly or through their firms or corporations, have prosecuted over one-half million US patents to issuance.

Some of the signers of this letter were, at the USPTO's invitation, beta testers of the USPTO's ePave e-filing system, and saw the complete failure of that e-filing system and USPTO's eventual abandonment of that e-filing system.

Some of the signers of this letter were, at the USPTO's invitation, alpha testers of the Patentcenter system upon its launch for alpha testing in 2018. We reported flaws and deficiencies in the Patentcenter system as it appeared in 2018. Other signers of this letter were, at the USPTO's invitation, participants in the private beta test of Patentcenter beginning in 2019, and reported additional flaws and deficiencies. We are disappointed to see that many of the flaws and deficiencies which we reported to the USPTO as long ago as 2018 remain outstanding in the system even now in December of 2021. The signers of this letter continue to report flaws and deficiencies in the Patentcenter system. We continue to be disappointed at the many flaws and deficiencies that remain outstanding in the system.

We are aware of the USPTO's view that its Ideascale system is supposedly a workable system by which users of Patentcenter could report flaws and deficiencies in Patentcenter, supposedly resulting in the USPTO correcting the flaws and deficiencies. This view on the USPTO's part is mistaken. We have reported many dozens of flaws and deficiencies to the USPTO through its Ideascale system from as long ago as 2018 to the present, and in almost no case has any such report resulted in the USPTO correcting the flaw or deficiency. Indeed it appears to us that the strongest indication of the USPTO's real handling of our reports of flaws and deficiencies in Patentcenter during the alpha test may be seen in the USPTO's having simply deleted all of the postings of the alpha testers from public view. It seems to us that the simplest and most accurate characterization of Ideascale is that "Ideascale is where good ideas go to die."

USPTO has also said repeatedly that the only other reporting path that it is willing to accept for flaws and deficiencies in Patentcenter besides Ideascale is the opening of trouble tickets with the Electronic Business Center ("EBC"). We have found the people at the EBC to be unfailingly polite and over the

past three years, they have methodically opened many dozens of trouble tickets at our request relating to bugs in Patentcenter. We understand that it is not the responsibility of the EBC itself to correct the bugs, but instead that the EBC passes along such trouble tickets to others at the USPTO. Our experience is that as a general matter, we do not hear back from anyone at the USPTO in response to most of the trouble tickets. Although a few of the bugs in Patentcenter which we have reported through the EBC have been corrected, the great majority of the bugs that we have reported through trouble tickets at the EBC have not been corrected. Most of the EBC trouble tickets have been outstanding for well over a year with no response from the USPTO and with the reported problem remaining uncorrected.

We have accumulated a list of Patentcenter trouble tickets on a web site. The number of trouble tickets by now exceeds seventy. We have accumulated a list of Patentcenter feature requests on the web site. The number of feature requests by now is at least forty. As best we can see, only at most about six of the trouble tickets have been cleared by the USPTO. Most of the trouble tickets have been outstanding for more than a year. As best we can see, not one of the feature requests has been implemented. In fairness to the USPTO, we have also accumulated a list of good things about Patentcenter, and this list is also provided on the web site. Nothing would delight us more than if this relatively short list could grow longer, perhaps in part as a result of future cooperation between the USPTO and our group of users of Patentcenter.

We find very discouraging the USPTO's repeated refusal to set up any path for two-way communication with our group of Patentcenter users despite our repeated requests over the past year and a half. USPTO regularly communicates in both directions with other groups of users, for example by sending people in person to meetings of the AIPLA and the ABA and INTA and IPO. You yourself recently went in person to attend a meeting of the AIPLA.

We ask that you do the following:

- Direct your Patentcenter developers to identify one or two people from their developer team to subscribe to the Patentcenter listserv to follow the postings. This might sometimes permit those people to pass things along from the listserv to appropriate colleagues on the Patentcenter developer team.
- Direct your developers to formally adopt the Patentcenter listserv trouble ticket page as a "to do" list for trouble ticket action by the developers.
- Direct your developers to formally adopt the Patentcenter listserv feature request page as a place for the developers to receive feature requests for Patentcenter.
- Direct your developers to report back to the people of the Patentcenter listserv each time the developers clear a trouble ticket, referencing the listserv trouble ticket number in the report.
- Direct your developers to report back to the people of the Patentcenter listserv each time the developers implement a feature request, referencing the listserv feature request number in the report.
- Direct your developers to cooperate with the people of the Patentcenter listserv by means of some periodic two-way communications by which the progress with trouble tickets and feature requests may be reviewed.

To summarize, it is clear to us that the USPTO is quite mistaken in any view that its two existing mechanisms (Ideascale and submission of EBC trouble tickets) have been or are satisfactory ways to get flaws and deficiencies in Patentcenter corrected. Some of the flaws and deficiencies which our people have reported to the USPTO through these two mechanisms as long ago as 2018 remain

uncorrected, and most of the flaws and deficiencies which our people have reported to the USPTO through these two mechanisms have been outstanding for well over a year. Those mechanisms just don't work.

If USPTO people can (and do) engage in two-way communication with other groups of practitioners and USPTO customers, then it seems to us that USPTO ought likewise to engage in two-way communication with our group of practitioners and USPTO customers. USPTO's goal of developing a new system (Patentcenter) that will provide all of the functions of EFS-Web and PAIR has a long way to go before it will achieve that goal, and this group was established specifically to assist the USPTO toward that goal. USPTO's goal of correcting flaws and deficiencies in Patentcenter is likewise far off, and this group was established specifically to help the USPTO with that goal as well. We hope the USPTO would realize that it can better serve its own goals by accepting our offers of help rather than by rebuffing them.

Respectfully submitted,

Andrew Berks	Gallet Dreyer & Berkey LLP
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Exhibit B

Subject: Tickets for next discussion

From: Carl Oppedahl <carl@oppedahl.com>

Date: 7/11/2023, 2:09 PM

To: "Vidovich, Greg" <Greg.Vidovich@USPTO.GOV>

Hello Greg. Let's resume our periodic videoconferences about patentcenter trouble tickets. I suggest that in our first videoconference we could discuss these seven tickets.

Carl

CP28. January 2019. Patentcenter saves up any real or imagined defect in an uploaded file on the “upload documents” page, and only three screens later, on the “submit” page, only when the user clicks “submit”, does Patentcenter for the first time gripe about the real or imagined defect. See [blog article](#). USPTO considers this to be a feature rather than a bug. It was agreed in our July 1, 2020 meeting that USPTO would add a warning on the document upload page so that the user will realize they are only postponing the inevitable and will eventually have to return to this page to provide a document description.

CP31. June 23, 2020. The default “outgoing correspondence” filter is three days since imaging, but quite often the USPTO clerks take four days after imaging a document to mail it. This means that users will very predictably not be told about some eleven percent of their outgoing correspondence. See [blog article](#). This is [Ideascale idea number 523](#). We raised this in our July 1, 2020 meeting.

CP49. May 27, 2021. This ticket relates to 35-series applications (US designation from a Hague application). When the user tries to pay an Issue Fee using the web-based tool for paying Issue Fees, the system refuses to do so, saying that the tool is not available for this kind of patent application. The error message is “The application type entered does not allow for use of the Web-Based Issue Fee Transmittal.”

CP51. May 27, 2021. This ticket relates to 35-series applications (US designation from a Hague application). When the user tries to carry out any SFD (subsequently filed document) or follow-on submission, a wholly inappropriate warning appears that scolds the filer for thinking that the e-filed document might go to the International Bureau. Patentcenter says:

The entered application has been transmitted to the International Bureau. The USPTO will not forward, to the International Bureau, follow-on submissions that are received after an international design application has been transmitted to the International Bureau. Thus, for example, where the International Bureau has sent an invitation requiring compliance with a requirement under the Hague Agreement, the applicant must file any reply to that invitation directly with the International Bureau to avoid abandonment or other loss of rights under the treaty.

The warning message should be scrapped since any filing in a 35-series case is by definition directed to the USPTO, not to the IB.

CP96. February 8, 2023. In any case in the “35 series” (meaning a designation to the US from a Hague application), Patentcenter refuses to permit the filer to select a document description of “Request for corrected filing receipt”. This is EBC ticket number 1-823950508.

CP99. February 20, 2023. Patentcenter fails to check for two attempted entries into US national phase from a single PCT application. See for example Patentcenter number 60947671 e-filed on September 8, 2022 and Patentcenter number 61618254 e-filed on February 19, 2023.

CP117. August 9, 2020. In EFS-Web each ack receipt gets a file name that is unique. Patentcenter always tries to give the same name (N417) to every ack receipt. What Patentcenter should do, as part of bringing forward features from EFS-Web, is give a unique name to each ack receipt. The source of uniqueness in the file name for the ack receipt could be the application number or the docket number or even the patentcenter submission number. This is Ideascale [idea number 595](#). (Formerly FR40.) We raised this in the July 1, 2020 meeting.

Exhibit C

Subject: Please make a correction on the USPTO web site

From: Carl Oppedahl <carl@oppedahl.com>

Date: 6/9/2023, 2:17 PM

To: "Vidal, Kathi" <kathi.vidal@uspto.gov>

Hello Director Vidal. I write to you on behalf of the Patentcenter listserv, a community of over three hundred patent practitioners before the USPTO. On the USPTO web site at <https://patentcenter.uspto.gov/>, you say:

Patent Center has 100% of the functionality of EFS-Web, Public and Private PAIR, and is available to all users for electronic filing and management of patent applications.

This is flatly false. The true percentage might be 70% or so. Here are just a small fraction of the ways that Patent Center fails to have the functionality of EFS-Web and Private PAIR:

- The default “outgoing correspondence” filter for Patentcenter is three days since imaging, while the default “outgoing correspondence” filter for PAIR is seven days. This means that users of Patentcenter to try to “display outgoing correspondence” will very predictably not be told about some eleven percent of their outgoing correspondence. This is Patentcenter trouble ticket CP31 ([click here to see it](#)) which has been outstanding now for almost three years.
- “Sort by patent number” works correctly in the PAIR workbench, but does not work correctly in the Patentcenter workbench. This is Patentcenter trouble ticket CP33 ([click here to see it](#)) which has been outstanding now for well over two years.
- For a 35-series application (a “Hague” application), payment of an Issue Fee using the web-based tool works in EFS-Web, but is broken in Patentcenter. This is Patentcenter trouble ticket CP49 ([click here to see it](#)) which has been outstanding now for more than two years.
- During a Track-I filing in EFS-Web, the system prompts the filer to pay both of the Track-I fees. Patentcenter fails to prompt the user to pay both of the fees. This is Patentcenter trouble ticket CP92 ([click here to see it](#)) which has been outstanding since February.
- In a 35-series application (a “Hague” application), in EFS-Web the filer can select a document description of “Request for corrected filing receipt”. Patentcenter fails to make such a document description available. This is Patentcenter trouble ticket CP96 ([click here to see it](#)) which has been outstanding since February.
- In a provisional application, EFS-Web permits use of the web-based corrective ADS. Patentcenter refuses to permit this. This is Patentcenter trouble ticket CP98 ([click here to see it](#)) which has been outstanding since February.
- In EFS-Web, the system guards against a possible duplicate attempt to enter the US national stage from a particular PCT application. Patentcenter fails to do so. This is Patentcenter trouble ticket CP99 ([click here to see it](#)) which has been outstanding since February.
- In EFS-Web, if you file a PCT application using a Zip file, you can select the correct filing fee for this kind of filing. Patentcenter refuses to permit the correct filing fee for this kind of filing. This is Patentcenter trouble ticket CP111 ([click here to see it](#)) which has been outstanding since February.

- In PAIR, for a 371 case, the user can go to the Continuity tab and can copy the PCT application number. In Patentcenter, it is impossible to copy the PCT application number. This is Patentcenter trouble ticket CP114 ([click here to see it](#)) which has been outstanding since March.
- PAIR provides the “status code” number for a pending patent application. Patentcenter fails to do so. This is Patentcenter trouble ticket CP116 ([click here to see it](#)) which has been outstanding since March.
- In EFS-Web, each acknowledgment receipt gets a unique file name. Patentcenter fails to do this. This is Patentcenter trouble ticket CP117 ([click here to see it](#)) which has been outstanding since March.

This problem with the false statement about Patent Center was reported to the USPTO with EBC ticket number 1-831173674 on May 25, 2023, but the USPTO has not taken any corrective action.

We request that you correct that incorrect statement on the USPTO web site.

Carl
Carl Oppedahl
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