



701 Exposition Place, Suite 206 • Raleigh, NC 27607  
Phone: 919-230-9635 • Email: [representative@napp.org](mailto:representative@napp.org)  
Website: <https://www.napp.org/>

October 31, 2023

Via Email [Kathi.Vidal@uspto.gov](mailto:Kathi.Vidal@uspto.gov)

Director Kathi Vidal  
United States Patent and Trademark Office  
P.O. Box 1450  
Alexandria, VA 22313

**Re: Patent Center and retirement of EFS-Web and Private PAIR**

Dear Director Vidal:

The National Association of Patent Practitioners (NAPP) writes to express our grave concerns at retiring the two proven systems, Private PAIR and EFS-Web. NAPP members continue to experience significant downtime and bugs when using Patent Center, each of which materially impacts our Members' ability to meet their clients' needs. For instance, I was using Patent Center today, and received numerous "Search Limit Reached" messages. This indicates that the Patent Center servers currently have a capacity issue, even before adding the workload currently handled by PAIR and EFS.

NAPP urges the USPTO to postpone retiring EFS-Web and Private PAIR until Patent Center is truly ready. Based on the rate at which bugs and instabilities have been declining and features have been implemented over the past few months, Patent Center will not be ready for at least six months.

NAPP's membership is looking forward to using Patent Center. However, it is clear Patent Center is not yet ready to stand alone. Two proven systems, Private PAIR and EFS-Web, have been supporting and operating in parallel with Patent Center for several years and it is evident to NAPP and its members that these systems can and should continue to do so until such a time as Patent Center is stable and fully operational.

Sincerely,

A handwritten signature in blue ink, appearing to read "R. Baker", is written over a light blue horizontal line.

Richard Baker  
President of the National Association of Patent Practitioners