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IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	92070407
Party	Plaintiff AWP USA Inc.
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Submission	Plaintiff's Notice of Reliance
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Signature	/David Ludwig/
Date	06/11/2020
Attachments	AWP Third Notice of Reliance.pdf(160328 bytes) Exhibit C.pdf(754655 bytes)

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

**IN THE MATTER OF Trademark Registration No. 5,323,248
For the mark CHUBB TRAVEL SMART;
Registered on October 31, 2017**

AWP USA INC.,)	
)	
Petitioner,)	
)	
v.)	Cancellation No. 92070407
)	
CHUBB INA HOLDINGS INC.,)	
)	
Registrant.)	
_____)	

PETITIONER’S THIRD NOTICE OF RELIANCE

Petitioner, through counsel, hereby submits this Notice of Reliance pursuant to 37 C.F.R. § 2.122(e). Specifically, Petitioner relies on the following printed publication available to the general public or that segment of the public that is relevant to the issues in this proceeding:

Printed Publication Evidence for the following (**Exhibit C**):

- a. International Travel & Health Insurance Journal, January 2018, Issue 204, page 1(cover page) and 14.

The attached printed publication is relevant to show that Petitioner’s goods and services and Registrant’s goods are sufficiently related in the eyes of the public to cause source confusion between Petitioner’s and Registrant’s brands, and Registrant’s trade channels of its mobile applications are overlapping with Petitioner’s trade channels of its mobile applications.

DATED this 11th day of June 2020.

Respectfully submitted,

AWP USA INC.,
Petitioner,
By counsel,

/s/ David Ludwig

David Ludwig
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CERTIFICATE OF SERVICE

I hereby certify that a true and complete copy of the foregoing has been served upon Registrant by E-Mail on this 11th day of June 2020, addressed as follows:

Jenifer Dewolf Paine
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Times Square Tower 20th Floor
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/s/ David Ludwig
David Ludwig

EXHIBIT C



Travel safe, travel happy **Winter woes**

New analyses from two separate surveys have shed light on the mysterious travel insurance buying habits of American travellers

A new survey from GO Group, an international ground transportation provider, has shown that just under half of those surveyed (42 per cent) had bought travel insurance at least once. Of those, 22 per cent said they always purchase it, 16 per cent said they usually do, and 28 per cent said they do sometimes. Twenty-two per cent of those who have purchased travel insurance said they have had to cancel a trip and use their insurance benefits in this regard. Of those who had to cancel a trip, 45 per cent reported that they were satisfied with the results provided by their policy, while 12 per cent said they were not. Forty-three per cent said they could not recall. Comments included one from a respondent who said they were not satisfied when they had to use the insurance that they had purchased from a cruise line, noting that not everything was covered. Another said that the travel insurance they purchased wasn't worth it; the reimbursement for a flight delay was only \$50 and hotels near airports often cost more than twice that amount. Those who haven't purchased travel insurance

CONTINUED ON PAGE 6



Are older travellers taking more risks on the slopes than younger ones?

New research from British travel association ABTA shows that winter sports holidaymakers over the age of 55 are the least likely demographic to check whether they have taken out appropriate insurance for the activities they are planning, including skiing and snowboarding. Well over a third of those over the age of 55 who take winter sports holidays admit they never check that they are covered correctly, significantly above the average of 29 per cent. On the other hand, younger generations take more care with their winter sports holiday cover – only one in seven 18-to-24 year olds say that they never check if they have the right insurance. With almost three in 10 people who take winter sports holidays admitting that they never check if they have the correct cover, this leaves thousands of British skiers and snowboarders at risk of hitting the slopes without proper insurance – and as 1.75 million Brits of all ages prepare to head off on snow sports holidays this winter, ABTA is encouraging them to stay safe on the slopes and make sure they have appropriate insurance. Winter sports holidays have experienced a particular growth in popularity among 55 and 64-year-olds, with ABTA's research showing that 238,000 people in this age range took a ski or snowboarding trip last year – double the number that said the same in the previous winter season. The UK Foreign and Commonwealth Office (FCO) reported 118 hospitalisations and 58 British deaths from skiing and snowboarding holidays between 2012 and 2016, with thousands more having suffered injuries both on- and off-piste.

The knowledge gap

In similar news, new research from consumer advice service Travel Insurance Explained has shown that 54 per cent of holidaymakers do not appreciate that they have to buy a specialist policy if they plan on undertaking winter sports activities on holiday. A study by

CONTINUED ON PAGE 6

CONTINUED ON PAGE 8

Pre-travel health screening 'critical'



Despite the benefits it offers both staff and employers, health screening before sending staff overseas is currently under-utilised, according to The Health Insurance Group

"Health screening can help to identify new and pre-existing illnesses as well as those an individual may be at higher risk of developing," said the company. "Once identified, steps can be taken to prevent or manage these appropriately. This is particularly valuable for staff posted or travelling overseas, who may be unfamiliar with or uncomfortable accessing local healthcare. This becomes critical

for staff who are travelling to less developed or more remote locations."

Furthermore, health screening protects the employee, as suitable healthcare in the intended destination of the expatriate can be investigated before travel, any medication regimes can be evaluated to check that the medicines are available at the destination and suitable alternatives can be identified if not, which allows conditions to be successfully managed with minimal disruption or detriment.

For employers, meanwhile, health screening



New Orleans
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AGENDA HIGHLIGHTS INSIDE

Travel smart with TravelSmart

Global travel insurance and assistance provider Allianz Global Assistance recently launched an updated version of its TravelSmart app. Among the new features the insurer has reported are a simplified, 'more intuitive' user interface through which travellers can access their coverage details, claims status, flight status and useful information such as local emergency contact numbers. Additionally, the app now features an extensive directory of global medical facilities, police stations and US embassies, a medication dictionary, a first aid terms translation tool and an expanded suite of contact options through which users can get in touch with Allianz's service team. "Using our newly updated TravelSmart app is a great way for travellers to feel safe, secure and protected abroad and get the most out of their Allianz Travel Insurance policy," said Joe Mason, chief marketing officer for the Americas at Allianz Partners USA. "We've completely redesigned our award-winning app with new features that enable everyone to travel confidently and quickly and easily get access to the information and services they may need. TravelSmart is just one of many innovations we're bringing to the market to serve the digital traveller now and in the future."

... and with Travel Smart

Chubb has also recently announced an update to its Travel Smart – two words this time – app for business travellers. Travel Smart has been designed to help employers with globally mobile employees

to fulfil their duty of care requirements for business travellers, and to provide necessary travel information and safety alerts for business travellers. The app has reportedly been rewritten 'from the ground up', with various new features; it takes in information from thousands of global sources, including government bodies, news media, health databases and social media, filters and aggregates the data – which is reviewed regularly by experts – and pushes out alerts to users. At its best, threats can be verified and travellers warned within 15 to 20 minutes of an incident occurring, and updates can then be sent regularly to keep users abreast of what is happening. As well as containing a medical database of conditions and medications, an embassy locator and a currency converter,

the app also provides country-specific advice and pre-travel information, and can instantly connect them to emergency services while abroad. "The new version of the Chubb Travel Smart app represents a real step-change," said Stéphane Baj, regional director for corporate and affinity accident and health for Europe, Eurasia and Africa at Chubb, "delivering significant improvements to both travellers and the people tasked with the responsibility of ensuring they stay safe. Many of the new features have been built in response to feedback we have received from our customers since launching the proposition nearly three years ago, so we are quietly confident that users will find the new app and online dashboard easier to use and even more powerful."



New app from Travel Insured

US-based travel insurance provider Travel Insured International has announced the launch of its new app, designed to reduce the stresses of travelling. According to Travel Insured, the app allows users to buy and manage travel protection plans more easily, as well as providing innovative health and safety services thanks to health, safety, and risk management firm Sitata's involvement in the development process. The app will feature health advice for travellers, including recommended vaccinations or medicines for trips, as well as destination-specific safety advice, hospital locations and emergency numbers. Customers will also be able to purchase a plan and file a claim, says Travel Insured. The partnership with Sitata will allow customers to access up-to-date information on possible disruptive events at their destination using the firm's software. It uses artificial intelligence to gather information from both traditional news sources and social media, allowing users to gain information quicker than via governmental alerts. "Travel Insured is making an active investment in its services to improve our planholders' experience when away from home," said Travel Insured's CEO John Gehris. "With this new offering included in each and every plan, we're doing our best to ensure travel anxieties are kept to a minimum and now travellers can make informed, safe decisions with timely, relevant information."



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Cover-More invests in FitSense

Cover-More Group in Australia has announced the acquisition of a majority stake in data analytics company FitSense, an enterprise created by the National University of Singapore. FitSense's main capability, according to Cover-More, is to leverage health and fitness data from mobile apps and connected devices to support highly customised insurance products. It is able to consolidate a person's fitness data from devices such as smartwatches, mobile phones and other wearable devices and turn the data into an Activity Score, which can be used to predict the user's health and fitness level – and subsequently insurance risk and commensurate premium. "Cover-More continues to look for ways to proactively transform our business for our customers, to focus on them as individuals and deliver products that reflect their individuality. And FitSense's technology enables us to deliver highly

customised and highly optimised insurance solutions in real time," Mike Emmett, Cover-More Group CEO said. FitSense conducted several pilot studies in 2016 with insurers in Europe to find out how willing customers would be to share fitness data with insurers compared to filling out a questionnaire. "When it comes to medical insurance, people have to pay higher premiums if they had a family history of a chronic disease," Jan-Philipp Kruij, co-founder and CEO of FitSense explained. "However, those who have made healthier lifestyle choices and exercise regularly are not able to benefit from lower premiums. That inequity was our starting point for FitSense. Almost everyone has the option to make healthier lifestyle choices." FitSense will operate as a stand-alone entity, said Kruij, and will work with other insurers when it makes commercial sense to do so.

