



Public Consultation on Changes to Simplify Intellectual Property Processes and Improve User Experience with Digital Initiatives

60 mins estimated time to complete

Instructions

IPOS is conducting a public consultation on the proposed changes to simplify and streamline Intellectual Property ("IP") processes and improve user experience with digital initiatives. The public consultation period is from 17 August (Monday) to 14 September 2020 (Monday). An extension of the consultation period is not possible.

The public consultation paper can be accessed at <https://www.ipos.gov.sg/docs/default-source/resources-library/ipos-public-consultation-august-2020.pdf> (<https://www.ipos.gov.sg/docs/default-source/resources-library/ipos-public-consultation-august-2020.pdf>).

Please tell us about yourself

Before you provide your responses, please let us have your name, e-mail address, the name of your organisation (if applicable) and your designation in your organisation (if applicable). We may contact you for follow-up questions, if necessary.

1. Name

Tatsuya MORI

2. Email address

nagano@jipa.or.jp

3. Organisation (optional)

Japan Intellectual Property Association (JIPA)

4. Designation in your organisation (optional)

Managing Director (Patent in Southeast Asia)

General Note

Please note that toggling between Yes/No will result in your responses being deleted. Should you need to change your selection, please ensure that you have saved your responses.

5. I am answering questions in relation to

A: Simplifying and Streamlining of Patents Processes (3 sets of questions)

☐ NO

☒ YES

6. I am answering questions in relation to

B: Simplifying and Streamlining of Trade Marks Processes (2 sets of questions)

X NO

✓ YES

7. I am answering questions in relation to

C: Simplifying and Streamlining of Common Processes (3 sets of questions)

X NO

✓ YES

8. I am answering questions in relation to

D: Improving User Experience with Digital Initiatives (1 set of question)

X NO

✓ YES

A: SIMPLIFYING AND STREAMLINING PATENTS PROCESSES

9. Question A1. Examiner-initiated informal communication (optional)

a) Are you supportive of this proposed process? Please elaborate with reason(s).

Yes. We are supportive of the proposed process from the view of the procedure simplification.

10. Question A1. Examiner-initiated informal communication (optional)

b) If supportive, is 2 months a reasonable period for the applicant to submit the response following an examiner-initiated informal communication? If no, please propose a period and provide us with the rationale.

We don't think the two-month period is long enough. For non-English speaking foreign applicants, it may take some time to prepare the translation, so a period of about 3 months

11. Question A2. Examination review (optional)

a) Are you supportive of this proposed change? Please elaborate with reason(s).

Yes. We are supportive of the proposal, because the revised content will be reviewed by the examiner.

12. Question A2. Examination review (optional)

b) What are your considerations when deciding if you wish to submit amendments and written submissions or only written submissions during the examination review stage?

When the examiner receive such as amendments and written submissions, we would appreciate it if the examiner could take into account the content of the amendment and confirm whether

13. Question A2. Examination review (optional)

c) Based on the current examination review process, where the applicant files written submissions and amendments during the request for an examination review, it is apparent that the applicant intends to amend the application to overcome the objections in the earlier examination report. While the examiner has to provide an opinion on whether he agrees/disagrees with the earlier examination report during the examination review, what are the applicant's reason(s) for seeking this opinion?

One of the purposes of the applicant is to confirm whether the examiner's recognition is the same as the applicant's recognition.

14. Question A3. Publication of translation of international application (optional)

a) Are you supportive of this proposed change? Please elaborate with reason(s).

Yes.

The contents of the proposal are very useful for applicants for simplifying the procedure.

15. Question A3. Publication of translation of international application (optional)

b) If supportive, how do you think the process can be simplified?

It would be greatly appreciated if you provide a new formats that include both Patents Form 37 and Patents Form 38.

C: SIMPLIFYING AND STREAMLINING COMMON PROCESSES

16. Question C1. Relief measures for Trade Mark and Registered Design applications (optional)

a) Are you supportive of the proposed changes? Please elaborate with reason(s).

17. Question C1. Relief measures for Trade Mark and Registered Design applications (optional)

b) Would you have any refinements to the proposed changes? If yes, please elaborate.

18. Question C2. Amendments, corrections, rectifications (optional)

a) Do you agree that the proposed corrections relating to priority details and name of applicant which results in a change in IP ownership should be advertised? Please elaborate with reason(s).

This change might be great for users. Because it is possible for a third party to make an objection after confirming the content.

19. Question C2. Amendments, corrections, rectifications (optional)

b) Are there any other proposed corrections that you think should be advertised? Please elaborate with reason(s).

Related to question c) , We feel that two months is short.

20. Question C2. Amendments, corrections, rectifications (optional)

c) Is 2 months a reasonable period for advertisement? If no, please propose a period and provide us with the rationale.

We would appreciate it if you could consider extending the period (ex.3 months) .

21. Question C3. Application for registration of transactions for IP rights (optional)

a) Are you supportive of the proposal to streamline the definition of "relevant parties" across the Trade Marks, Registered Designs and Patents legislation? Please elaborate with reason(s).

Yes. We think the definition shown in 3.4 is reasonable and valid.

22. **Question C3. Application for registration of transactions for IP rights** (optional)

b) Do you have any refinement(s) to the proposed changes? If yes, please elaborate.

We are concerned that there are multiple interpretations of the definition of “beneficiary of an assent”. Therefore, we would appreciate it if you could clarify the definition a little more.

D: IMPROVING USER EXPERIENCE AND SERVICE WITH DIGITAL INITIATIVES

23. **Question D1. Use of Artificial Intelligence technologies in decision making** (optional)

a) Are the safeguard measures described in each example above sufficient? If not, what are your concerns, and what other operational and/or legislative safeguard measures would you deem necessary in the adoption of decision making by AI?

We think it is a very advanced and wonderful attempt. In particular, we strongly support the use of AI for translation of specifications as shown in 1.2, patent classification, and

24. **Question D1. Use of Artificial Intelligence technologies in decision making** (optional)

b) While IPOS will carry out due diligence and conduct rigorous testing before rolling out AI solutions, are there other specific areas you think should be paid attention to? If so, please elaborate on the reasons and also possible measures.

When you adopt the AI solutions to IP field, the following areas are specific area.
Ex. Judgment of inventive step of patent, Judgment of well-

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Question	Comment
Question A1 a) Are you supportive of this proposed process? Please elaborate with reason(s).	Yes. We are supportive of the proposed process from the view of the procedure simplification.
b) If supportive, is 2 months a reasonable period for an applicant to submit the response following an examiner-initiated informal communication? If no, please propose a period and provide us with the rationale.	We don't think the two-month period is long enough. For non-English speaking foreign applicants, it may take some time to prepare the translation, so a period of about 3 months would be better for us.
Question A2 a) Are you supportive of this proposed change? Please elaborate with reason(s).	Yes. We are supportive of the proposal, because the revised content will be reviewed by the examiner.
b) What are your considerations when deciding if you wish to submit amendments and written submissions or only written submissions during the examination review stage?	When the examiner receive such as amendments and written submissions, we would appreciate it if the examiner could take into account the content of the amendment and confirm whether or not the content shown in the examination report was appropriate. (Reason: It might be possible to confirm the intention of amendments, written submission etc.).
c) Based on the current examination review process, where an applicant files written submissions and amendments during the request for an examination review, it is apparent that the applicant intends to amend the application to overcome the objections in the earlier examination report. While the examiner has to provide an opinion on whether he agrees/disagrees with the earlier examination report during the examination review, what are the applicant's reason(s) for seeking this opinion?	One of the purposes of the applicant is to confirm whether the examiner's recognition is the same as the applicant's recognition. In relation to A2 b), amendments are often made according to the content of the examiner report, so it is useful for the examiner and the applicant if it is possible to confirm whether the examiner's recognition is the same as the applicant's recognition about the earlier examination report.
Question A3 a) Are you supportive of this proposed change? Please elaborate with reason(s).	Yes. The contents of the proposal are very useful for applicants for simplifying the procedure.
b) If supportive, how do you think the process can be further simplified?	It would be greatly appreciated if you provide a new formats that include both Patents Form 37 and Patents Form 38.
Question C2 a) Do you agree that the proposed corrections relating to priority details and name of applicant which result in a change in IP ownership should be advertised? Please elaborate with reason(s).	This change might be great for users. Because it is possible for a third party to make an objection after confirming the content.

b) Are there any other proposed corrections that you think should be advertised? Please elaborate with reason(s).	Related to question c) , We feel that two months is short.
c) Is 2 months a reasonable period for advertisement? If no, please propose a period and provide us with the rationale.	We would appreciate it if you could consider extending the period (ex.3 months) .
Question C3 a) Are you supportive of the proposal to streamline the definition of “relevant parties” across the Trade Marks, Registered Designs and Patents legislation? Please elaborate with reason(s).	Yes. We think the definition shown in 3.4 is reasonable and valid.
b) Do you have any refinement(s) to the proposed changes? If yes, please elaborate.	We are concerned that there are multiple interpretations of the definition of “beneficiary of an assent”. Therefore, we would appreciate it if you could clarify the definition a little more.
Question D1 a) Are the safeguard measures described in each example above sufficient? If not, what are your concerns, and what other operational and/or legislative safeguard measures would you deem necessary in the adoption of decision making by AI?	<p>We think it is a very advanced and wonderful attempt. In particular, we strongly support the use of AI for translation of specifications as shown in 1.2, patent classification, and trademark image search in 1.3.</p> <p>On the other hand, there are some concerns about using AI for examination. Specifically, when you adopt the AI solutions to examine patents, we are concerned that there may be differences in the examination's results between AI and the examiner. If there is the difference, we think that it affects the quality of rights.</p> <p>Therefore, as you have planned, we appreciate that you conduct a verification test in advance and check whether the examination criteria between AI and humans match.</p> <p>And we would also appreciate if you consider to make a system for the quality of examination, such as checking by an examiner at the beginning of the introduction.</p>

<p>b) While IPOS will carry out due diligence and conduct rigorous testing before rolling out AI solutions, are there other specific areas you think that should be paid attention to? If so, please elaborate on the reasons and also possible measures.</p>	<p>When you adopt the AI solutions to IP field, the following areas are specific area. Ex.Judgment of inventive step of patent, Judgment of well-known of trademark, Judgment of similarity of industrial design.</p> <p>Because it is required some experience for examination. As a countermeasure, we think it is important to conduct a verification test and confirm that sufficient accuracy can be expected.</p> <p>In addition, it is also known that the accuracy of AI engine recognition changes over time.The result of prior patent search is an important factor for judging novelty/inventive step, but if it changes, it may affect the examination. Therefore, please conduct a careful examination through demonstration experiments.</p>
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Please tell us about yourself

Before you provide your responses, please let us have your name, e-mail address, the name of your organisation (if applicable) and your designation in your organisation (if applicable). We may contact you for follow-up questions, if necessary.

1. Name

Makoto FUKUOKA

2. Email address

nagano@jipa.or.jp

3. Organisation (optional)

Japan Intellectual Property Association (JIPA)

4. Designation in your organisation (optional)

Managing Director (Design)

General Note

Please note that toggling between Yes/No will result in your responses being deleted. Should you need to change your selection, please ensure that you have saved your responses.

5. I am answering questions in relation to

A: Simplifying and Streamlining of Patents Processes (3 sets of questions)

☒ NO

☐ YES

6. I am answering questions in relation to

B: Simplifying and Streamlining of Trade Marks Processes (2 sets of questions)

☒ NO☐ YES

7. I am answering questions in relation to

C: Simplifying and Streamlining of Common Processes (3 sets of questions)

☒ NO☐ YES

8. I am answering questions in relation to

D: Improving User Experience with Digital Initiatives (1 set of question)

☒ NO☐ YES

C: SIMPLIFYING AND STREAMLINING COMMON PROCESSES

9. Question C1. Relief measures for Trade Mark and Registered Design applications (optional)

a) Are you supportive of the proposed changes? Please elaborate with reason(s).

We are supportive of the proposed changes. Because the proposed period to reinstate for design registration is equal to or longer than that of other countries, we believe that the two

10. Question C1. Relief measures for Trade Mark and Registered Design applications (optional)

b) Would you have any refinements to the proposed changes? If yes, please elaborate.

No, we do not have any refinements to the proposed changes.

11. Question C2. Amendments, corrections, rectifications (optional)

a) Do you agree that the proposed corrections relating to priority details and name of applicant which results in a change in IP ownership should be advertised? Please elaborate with reason(s).

Yes, we agree that the proposed corrections relating to priority details and name of applicant which result in a change in IP ownership should be advertised because third parties would be

12. Question C2. Amendments, corrections, rectifications (optional)

b) Are there any other proposed corrections that you think should be advertised? Please elaborate with reason(s).

No, there are not any other proposed corrections.

13. Question C2. Amendments, corrections, rectifications (optional)

c) Is 2 months a reasonable period for advertisement? If no, please propose a period and provide us with the rationale.

2-months is a reasonable period for advertisement.

14. Question C3. Application for registration of transactions for IP rights (optional)

a) Are you supportive of the proposal to streamline the definition of "relevant parties" across the Trade Marks, Registered Designs and Patents legislation? Please elaborate with reason(s).

Yes, we are supportive of the proposal.

15. **Question C3. Application for registration of transactions for IP rights** (optional)

b) Do you have any refinement(s) to the proposed changes? If yes, please elaborate.

No, we do not have any refinement(s) to the proposed changes.

D: IMPROVING USER EXPERIENCE AND SERVICE WITH DIGITAL INITIATIVES

16. **Question D1. Use of Artificial Intelligence technologies in decision making** (optional)

a) Are the safeguard measures described in each example above sufficient? If not, what are your concerns, and what other operational and/or legislative safeguard measures would you deem necessary in the adoption of decision making by AI?

In the current situation where the accuracy of examination by AI is unknown, we are concerned about AI making decisions on design registration.

17. **Question D1. Use of Artificial Intelligence technologies in decision making** (optional)

b) While IPOS will carry out due diligence and conduct rigorous testing before rolling out AI solutions, are there other specific areas you think should be paid attention to? If so, please elaborate on the reasons and also possible measures.

So far, we don't have any specific idea now.

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Question	Comment
Question C1 a) Are you supportive of the proposed changes? Please elaborate with reason(s).	We are supportive of the proposed changes. Because the proposed period to reinstate for design registration is equal to or longer than that of other countries, we believe that the two months is sufficient for the reinstatement period.
b) Would you have any refinements to the proposed changes? If yes, please elaborate.	No, we do not have any refinements to the proposed changes.
Question C2 a) Do you agree that the proposed corrections relating to priority details and name of applicant which result in a change in IP ownership should be advertised? Please elaborate with reason(s).	Yes, we agree that the proposed corrections relating to priority details and name of applicant which result in a change in IP ownership should be advertised because third parties would be able to have the opportunity to oppose the correction.
b) Are there any other proposed corrections that you think should be advertised? Please elaborate with reason(s).	No, there are not any other proposed corrections.
c) Is 2 months a reasonable period for advertisement? If no, please propose a period and provide us with the rationale.	2-months is a reasonable period for advertisement.
Question C3 a) Are you supportive of the proposal to streamline the definition of “relevant parties” across the Trade Marks, Registered Designs and Patents legislation? Please elaborate with reason(s).	Yes, we are supportive of the proposal.
b) Do you have any refinement(s) to the proposed changes? If yes, please elaborate.	No, we do not have any refinement(s) to the proposed changes.

<p>Question D1</p> <p>a) Are the safeguard measures described in each example above sufficient? If not, what are your concerns, and what other operational and/or legislative safeguard measures would you deem necessary in the adoption of decision making by AI?</p>	<ul style="list-style-type: none"> • In the current situation where the accuracy of examination by AI is unknown, we are concerned about AI making decisions on design registration. -In AI-based examinations, if there are revisions to the examination guidelines or changes in judicial precedents, we would like IPOS to make AI-based decisions based on those changes. • From the applicant's point of view, we would like IPOS to send us a notification that logically explains the reason for the decision by AI. <p>For example, we need a logical explanation as to why an application design was determined to be non-novelty in its similarity to previous designs.</p>
<p>b) While IPOS will carry out due diligence and conduct rigorous testing before rolling out AI solutions, are there other specific areas you think that should be paid attention to? If so, please elaborate on the reasons and also possible measures.</p>	<p>So far, we don't have any specific idea now.</p>



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Please tell us about yourself

Before you provide your responses, please let us have your name, e-mail address, the name of your organisation (if applicable) and your designation in your organisation (if applicable). We may contact you for follow-up questions, if necessary.

1. Name

Koji SAITO

2. Email address

nagano@jipa.or.jp

3. Organisation (optional)

Japan Intellectual Property Association (JIPA)

4. Designation in your organisation (optional)

Managing Director (Trademark)

General Note

Please note that toggling between Yes/No will result in your responses being deleted. Should you need to change your selection, please ensure that you have saved your responses.

5. I am answering questions in relation to

A: Simplifying and Streamlining of Patents Processes (3 sets of questions)

☒ NO

☐ YES

6. I am answering questions in relation to

B: Simplifying and Streamlining of Trade Marks Processes (2 sets of questions)

X NO

✓ YES

7. I am answering questions in relation to

C: Simplifying and Streamlining of Common Processes (3 sets of questions)

X NO

✓ YES

8. I am answering questions in relation to

D: Improving User Experience with Digital Initiatives (1 set of question)

X NO

✓ YES

B: SIMPLIFYING AND STREAMLINING TRADE MARKS PROCESSES

9. Question B1. Partial refusal mechanism for national applications (optional)

a) Do you agree with the adoption of the "partial refusal" mechanism for the national Trade Mark regime? Please elaborate with reason(s).

Yes, we agree with the adoption of the "partial refusal" mechanism for the national Trade Mark regime because we can have several options to pursue our partially refused application

10. Question B1. Partial refusal mechanism for national applications (optional)

b) What is/are the key priority you consider in the course of Trade Mark registration? (e.g., speed, cost, specificity in relation to objectionable goods and/or services, clarity in examination decisions)

We consider that speed, cost and clarity in examination decisions are the key priority in the course of Trade Mark registration.

11. Question B1. Partial refusal mechanism for national applications (optional)

c) If you have a partially refused application, will you be more inclined to (i) proceed with an amendment as proposed by the Registrar; (ii) initiate an amendment form (and relevant fee) to remove the objectionable goods and/or services; or (iii) wait for the stipulated timelines to lapse and automatically proceed to the next processing stage? Please provide reason(s) for your option.

We will be more inclined to wait for the stipulated deadlines to lapse and automatically proceed to the next processing stage because of the cost-saving.

12. Question B1. Partial refusal mechanism for national applications (optional)

d) If objectionable goods and/or services are stated upfront in the examination report in a partially refused application, will you be more inclined to divide out the objectionable portion(s) of the application? Please provide reason(s) for doing/not doing so.

13. Question B2. Series of Trade Marks (optional)

a) Do you generally vary the use of your Trade Marks (such as differences in colour, capitalisation, or positioning of elements) in the course of trade? If so, how?

No, we do not generally vary the use of our Trade Marks.

14. Question B2. Series of Trade Marks (optional)

Are you supportive of the proposals to limit the maximum number and/or type of marks that can be filed in a single application? Please elaborate with reason(s).

Yes, we are supportive of the proposals to limit the maximum number and/or type of marks that can be filed in a single application because we think that capping the number of marks

15. Question B2. Series of Trade Marks (optional)

b) Which part of the Trade Marks Registry's Work Manual Chapter on "Series of Marks" do you find most useful and relevant for reference? Which part(s) do you find the most complex? Do you have any suggestion(s) on how the Chapter can be improved to better the understanding of the requirements for series marks?

C: SIMPLIFYING AND STREAMLINING COMMON PROCESSES

16. Question C1. Relief measures for Trade Mark and Registered Design applications (optional)

a) Are you supportive of the proposed changes? Please elaborate with reason(s).

We are supportive of the proposed changes because we can reinstate a trademark application which is treated as withdrawn due to irresistible forces.

17. Question C1. Relief measures for Trade Mark and Registered Design applications (optional)

b) Would you have any refinements to the proposed changes? If yes, please elaborate.

No, we do not have any refinements to the proposed changes.

18. Question C2. Amendments, corrections, rectifications (optional)

a) Do you agree that the proposed corrections relating to priority details and name of applicant which results in a change in IP ownership should be advertised? Please elaborate with reason(s).

Yes, we agree that the proposed corrections relating to priority details and name of applicant which result in a change in IP ownership should be advertised because the proposed changes

19. Question C2. Amendments, corrections, rectifications (optional)

b) Are there any other proposed corrections that you think should be advertised? Please elaborate with reason(s).

No, there are not any other proposed corrections.

20. Question C2. Amendments, corrections, rectifications (optional)

c) Is 2 months a reasonable period for advertisement? If no, please propose a period and provide us with the rationale.

2-months is a reasonable period for advertisement.

21. Question C3. Application for registration of transactions for IP rights (optional)

a) Are you supportive of the proposal to streamline the definition of "relevant parties" across the Trade Marks, Registered Designs and Patents legislation? Please elaborate with reason(s).

Yes, we are supportive of the proposal to streamline the definition of “relevant parties” across the Trade Marks because the proposal can reduce the burden on relevant parties.

22. Question C3. Application for registration of transactions for IP rights (optional)

b) Do you have any refinement(s) to the proposed changes? If yes, please elaborate.

No, we do not have any refinement(s) to the proposed changes.

D: IMPROVING USER EXPERIENCE AND SERVICE WITH DIGITAL INITIATIVES

23. Question D1. Use of Artificial Intelligence technologies in decision making (optional)

a) Are the safeguard measures described in each example above sufficient? If not, what are your concerns, and what other operational and/or legislative safeguard measures would you deem necessary in the adoption of decision making by AI?

The safeguard measures described in Determining the Registrability of Certain Trade Marks above look ok at this time. Keeping certain several options on applicants for rescue by human examiners would be also appreciated.

24. Question D1. Use of Artificial Intelligence technologies in decision making (optional)

b) While IPOS will carry out due diligence and conduct rigorous testing before rolling out AI solutions, are there other specific areas you think should be paid attention to? If so, please elaborate on the reasons and also possible measures.

Although we don't see any other specific areas for our attention at this time, it would be appreciated if you provide a certain process in advance for remedies in timely manner not to burden

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Question	Comment
Question B1 a) Do you agree with the adoption of the “partial refusal” mechanism for the national Trade Mark regime? Please elaborate with reason(s).	Yes, we agree with the adoption of the “partial refusal” mechanism for the national Trade Mark regime because we can have several options to pursue our partially refused application depending on the nature of the objection(s). Meanwhile, please note some of our member companies expressed concern that introducing partially refusal may lead to an increasing number of registrations that are not used in commerce. Accordingly, we will pay attention that IPOS keeps controlling the balance between cost efficiency and stability of trademark rights.
b) What is/are the key priority you consider in the course of Trade Mark registration? (e.g., speed, cost, specificity in relation to objectionable goods and/or services, clarity in examination decisions)	We consider that speed, cost and clarity in examination decisions are the key priority in the course of Trade Mark registration.
c) If you have a partially refused application, will you be more inclined to (i) proceed with an amendment as proposed by the Registrar; (ii) initiate an amendment form (and relevant fee) to remove the objectionable goods and/or services; or (iii) wait for the stipulated deadlines to lapse and automatically proceed to the next processing stage? Please provide reason(s) for your option.	We will be more inclined to wait for the stipulated deadlines to lapse and automatically proceed to the next processing stage because of the cost-saving.
Question B2 a) Do you generally vary the use of your Trade Marks (such as differences in colour, capitalisation, or positioning of elements) in the course of trade? If so, how?	No, we do not generally vary the use of our Trade Marks.
b) Are you supportive of the proposals to limit the maximum number and/or type of marks that can be filed in a single application? Please elaborate with reason(s).	Yes, we are supportive of the proposals to limit the maximum number and/or type of marks that can be filed in a single application because we think that capping the number of marks in a series to 4 seems reasonable.
Question C1 a) Are you supportive of the proposed changes? Please elaborate with reason(s).	We are supportive of the proposed changes because we can reinstate a trademark application which is treated as withdrawn due to irresistible forces.
b) Would you have any refinements to the proposed changes? If yes, please elaborate.	No, we do not have any refinements to the proposed changes.
Question C2 a) Do you agree that the proposed corrections relating to priority details and name of applicant which result in a change in IP ownership should be advertised? Please elaborate with reason(s).	Yes, we agree that the proposed corrections relating to priority details and name of applicant which result in a change in IP ownership should be advertised because the proposed changes can help promote greater transparency and certainty to the overall prosecution process.
b) Are there any other proposed corrections that you think should be advertised? Please elaborate with reason(s).	No, there are not any other proposed corrections.

c) Is 2 months a reasonable period for advertisement? If no, please propose a period and provide us with the rationale.	2-months is a reasonable period for advertisement.
Question C3 a) Are you supportive of the proposal to streamline the definition of “relevant parties” across the Trade Marks, Registered Designs and Patents legislation? Please elaborate with reason(s).	Yes, we are supportive of the proposal to streamline the definition of “relevant parties” across the Trade Marks because the proposal can reduce the burden on relevant parties.
b) Do you have any refinement(s) to the proposed changes? If yes, please elaborate.	No, we do not have any refinement(s) to the proposed changes.
Question D1 a) Are the safeguard measures described in each example above sufficient? If not, what are your concerns, and what other operational and/or legislative safeguard measures would you deem necessary in the adoption of decision making by AI?	The safeguard measures described in Determining the Registrability of Certain Trade Marks above look ok at this time. Keeping certain several options on applicants for rescue by human examiners would be also appreciated.
b) While IPOS will carry out due diligence and conduct rigorous testing before rolling out AI solutions, are there other specific areas you think that should be paid attention to? If so, please elaborate on the reasons and also possible measures.	Although we don’t see any other specific areas for our attention at this time, it would be appreciated if you provide a certain process in advance for remedies in timely manner not to burden the applicant when any coming problem is discovered in the future as a risk management.