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**EPO summary of comments on DIGITAL ACCESS SERVICE (DAS) 2.0
BUSINESS REQUIREMENTS Revision 2.1**

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Author(s):

N. Das Neves / C-R. Bogliolo / R. Souissi / S. Klocke / J. Cork

Responsible(s):

N. Morey / P. Schwander

EPO summary of comments on DIGITAL ACCESS SERVICE (DAS) 2.0 BUSINESS REQUIREMENTS Revision 2.1

In this document, the EPO would like to summarize its additional comments to the DIGITAL ACCESS SERVICE (DAS) 2.0 BUSINESS REQUIREMENTS Revision 2.1 with respect to the comments already made regarding the Revision 1.0 that were posted on the WIPO DAS consultative group forum on 16/01/2012.

The following comments made by the EPO to the Revision 1.0 using tracked changes are still valid:

- comments NDN[1-4, 8, 10-13, 17-18, 23-25, 29, 31, 36, 37].

The following paragraphs of the EPO summary of comments to the Revision 1.0 remain valid:

- §1.1; §1.2; §1.4; §1.5; §1.6; §2.1; §2.2.2; §2.2.3; §2.2.5-§2.2.8; §2.3.6; §3.1-3.3.

Additionally the EPO would like to formulate the following comments:

1. Regarding the third last paragraph of page 11, the EPO understands that an applicant will not be able to create an ACL. He would only be able to modify the (possible default) ACL set by the OFF. The EPO would like that applicants have the possibility to create their own ACL within their applicants portal, this would be a "customized ACL". Such a customized ACL would overwrite a possible existing default ACL set by the OFF used by the applicant. It would also be desirable that an applicant can reuse a customized ACL for several priority documents associated with his account. This option would give the possibility to make use of the second level of security provided by the use of an ACL, in case the OFF used by the applicant does not make use of this possibility.
In the EPO understanding of the DAS 2.0 Business Requirements Revision 2.1 document, different types of ACL can exist within the system, such as:
 - "Default ACL" set by an OFF if the OFF wants to make use of the same ACL for all the applications registered with WIPO DAS,
 - a "Specific ACL" created by an applicant via its portal if he so wishes for one particular application registered with WIPO DAS;
 - "Customized ACL" created by an applicant via its portal if he so wishes, which would set this same ACL for all of this applicant's registered applications, if the applicant so wishes.

A hierarchy for defining which of the above mentioned ACL would be the one in force would have to be defined for the cases that more than one of the above ACL would be set. The EPO would suggest that at least the Specific and/or the Customized ACL would overwrite the "Default ACL" (the level of detail in the hierarchy to be defined would depend on which ACLs the system would allow to coexist).

Moreover, the EPO requires that an applicant can only modify/edit a "default ACL" or a "specific ACL", but not delete it.

Consequently, the EPO would like WIPO to specify throughout the requirements document which ACL is meant, with the generic term "ACL" comprising any of the 3 above mentioned types of ACL.

2. The use of the word "recorded" in page 5, second bullet renders its meaning unclear to the EPO. Does the word "recorded" have a different meaning as "registered"? If yes, clarification as to the differences is needed. If no, then the EPO suggests to use a consistent terminology throughout the document.
3. For the EPO acting as OFF, i.e. when a priority document is retrievable from the EPO's own library, when **no ACL is associated** to such a priority document **no access should be granted** to any IPO for the corresponding priority document (see page 3, Security mechanisms, first paragraph). This security requirement would cover the risk that the default ACL that the EPO wants to set for every priority document has not been set due to a technical failure. Also, **by deleting the (default) ACL** set by an IPO, an applicant could decide **not to disseminate** his priority documents via WIPO DAS.
4. Regarding the suggestion to use an Access Code consisting in "exactly 4 alphanumeric characters, case insensitive" (see page 7, second bullet), the EPO would suggest to only use upper-case letters, and exclude some possibly confusing digits such as the letter O (confused with 0 - zero). The EPO would also suggest considering the use of hexadecimal characters, that could also be used to contain an intrinsic check digit, as is the case in some ISO standards such as ISO 7064. This could help prevent transcription errors and maintain the integrity of the Access Code as it is forwarded by the various actors.
5. Regarding page 11, first bullet, clarification is sought as to the role played by the applicant that would first associate his account with a priority document. Would this applicant be a "leading" applicant with respect to the co-applicants defined later or would the co-applicants all have equal management rights of the priority document?
6. The EPO would like that in page 5, point 1, it is specified that an OFF might not require a request from the applicant to register a priority document with the DAS system. This is the case of the EPO as already expressed in our comments to the Revision 1.0 (comment NDN10 and paragraph 2.2.2 of the EPO summary of comments).
7. The EPO would like that in page 13, step# 1, it is specified that an OFF might not require a request from the applicant to retrieve a priority document via DAS. This is the case of the EPO as already expressed in our comments to the Revision 1.0 (comment NDN10 and paragraph 2.2.6 of the EPO summary of comments).