Submission from Mr. Robert Wulff, Principal Griffith Hack

I had a look at the FICPI submissions, which are pretty comprehensive.

So, rather than repeat some or all of these, just a few comments/questions from me:

5 (c) product name of all products included in the application, enabling classification;

We don't as a rule query an o/s applicant as to whether the product name can be easily classified. We ask - will this proposal require the Locarno class to be listed in the application? That could prove to be cumbersome, especially where we are instructed close to the deadline.

5 (e) an indication of the number of designs in the application;

What if we file an application with multiple designs but pay the fees for one (only) because the applicant hasn't yet decided how many to proceed with? (this is quite common because o/s applicants are used to filing multiples at comparatively low cost). Will we still need to indicate the number of designs in the application anyway?

6(5) Representations must consist of one common image format, namely:
(a) drawings;
(b) photographs; or
(c) images derived from computer-aided-design.

We ask here if a rendering or a CAD image be filed as a reference view, where the rest of the drawings are, for example, drawings? (again, this is not an uncommon occurrence as such a rendering or a CAD image can often provide context that a line drawing cannot)

8(2) A representation must not include text which is descriptive, other than any word or words necessary for the labelling and understanding of the nature of the representation (e.g. 'Perspective View', 'Top View', 'Left-Side View' and 'Right-Side View' etc.).

Does this include alpha-numerical characters on a package and/or words such as play/stop on a device? In other words, can we still disclaim these features with the understanding that they are just exemplary, and are not intended to be descriptive?

8(3) A representation must not contain a statement of newness and distinctiveness, or wording to the effect of a statement of newness and distinctiveness.

Does this proposal extend to a SOND that is simply directed to the accompanying drawings as a whole?