

**BBC RESPONSE TO THE UKIPO CONSULTATION ON
ARTIFICIAL INTELLIGENCE AND IP: COPYRIGHT AND PATENTS**

After you have read the consultation document, please consider the questions below. There is no expectation or requirement that all questions are completed. You are welcome to only answer the questions that are relevant to you, your business or organisation.

A copy of this response form is available to download from GOV.uk.

There are two sections on this form:

A. Questions arising from this consultation

B. Information about you, your business or organisation

When you are ready to submit your response, please email this form and any other supporting documentation to Alcallforviews@ipo.gov.uk.

The closing date for responses is at 23:45 on 7 January 2022.

The options for computer generated works, text and data mining and patent inventorship are summarised in the following tables.

Computer generated works	
Option 0	Make no legal change
Option 1	Remove protection for computer-generated works
Option 2	Replace the current protection with a new right of reduced scope/duration

Text and Data Mining (TDM)	
Option 0	Make no legal change
Option 1	Improve licensing environment for the purposes of TDM
Option 2	Extend the existing TDM exception to cover commercial research and databases
Option 3	Adopt a TDM exception for any use, with a rights holder opt-out
Option 4	Adopt a TDM exception for any use, which does not allow rights holders to opt out

Patent Inventorship	
Option 0	Make no legal change
Option 1	“Inventor” expanded to include humans responsible for an AI system which devises inventions
Option 2	Allow patent applications to identify AI as inventor
Option 3	Protect AI-devised inventions through a new type of protection

Section A

Copyright – computer generated works (CGW)

1. *Do you currently rely on the computer-generated works provision? If so, please provide details of the types of works, the value of any rights you license and how the provision benefits your business. What approach do you take in territories that do not offer copyright protection for computer-generated works?*

The computer-generated works provisions only apply to literary, dramatic, musical and artistic (“LDMA”) works. Computer-generated works are defined in the Copyright Designs and Patents Act (“CDPA”)¹ as works with no human creator. Fully autonomous computer-generated works with no human involvement are not yet commonplace in the media and entertainment industry. Computers are largely still only used as tools and it remains possible to identify a human author, in which case the work generated falls within the scope of the ordinary copyright rules.

In 2018, the BBC produced short films using AI for the BBC Four programme *Made By Machines* (<https://www.bbc.co.uk/rd/blog/2018-09-artificial-intelligence-archive-made-machine>). In our view films such as this are capable of protection under the ordinary copyright rules for films.

Regardless of the status quo, at this point it seems inevitable that in future autonomy will increase with machines like DABUS already in existence and therefore that provisions dealing with autonomous computer-generated works will be required.

2. *Please rank these options in order of preference (most to least preferred) and explain why.*

Option 2: Replace the current protection with a new right of reduced scope/duration.	<p>A balance needs to be drawn between incentivising development in this area whilst continuing to support (and not disincentivise) human creativity, bearing in mind AI’s ability to create vast quantities of works relatively quickly and at relatively low cost. We believe the current provisions relating to originality and duration should be reconsidered (see question 3 below).</p> <p>There appear to be good arguments in favour of replacing the current protection with a sui generis right rather than attempting to stretch the current copyright regime:</p> <p>(a) It would allow more flexibility to create a bespoke regime rather than stretching the existing copyright regime which has been formulated around human centric concepts such as originality.</p>
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¹ Section 178: ““computer-generated”, in relation to a work, means that the work is generated by computer in circumstances such that there is no human author of the work;”

	<p>(b) International harmonisation - this is desirable in order to facilitate any kind of global market for such content, digital or otherwise.</p> <p>(c) If we want to lead in this area, having a standalone right with clear rules would make it easier for other countries to replicate than if the rules are intertwined with existing copyright rules.</p> <p>(d) Amending existing provisions to accommodate AI-produced works can result in uncertainty, as we have seen with the interplay between the existing provisions relating to computer-generated works and concepts which apply to other types of copyright work.</p> <p>We acknowledge that there are also potential negative aspects associated with this approach, such as uncertainty while law develops around a sui generis right and any novel concepts or terms that it entails (as observed with the sui generis database right). There is also a risk that rapid technology evolution will outpace legal development such that it is rendered ineffective. However, we believe that there is benefit in acting now, in order to facilitate development of law that is fit for purpose as the technology becomes increasingly commonplace.</p>
Option 0: Make no legal change.	<p>This would enable us to see how the technology develops and what other countries do in this area. Even if the current UK provisions are flawed (see question 3 below), they do at least provide protection for autonomously generated works and they do not currently appear to be dis-incentivising investment in AI. However, it seems highly likely there will eventually come a time when works are created autonomously with no human author and it would be desirable to have a system in place that is fit for purpose as the technology becomes increasingly commonplace. Whilst a wait and see approach would ensure that we do not fall out of step with other jurisdictions, such an approach is not compatible with ambitions to be a leader in this area.</p>
Option 1: Remove protection for computer-generated works	<p>Viewed through the lens of the UK's traditional rationale for copyright - that it is an economic tool that incentivises and rewards the creation of works - we are of the opinion that human investment in works generated by AI should be rewarded with some form of protection. For many organisations, the commercial exploitation of their copyright protected works and the ability to prevent others from copying them supports the creation of further works and this should apply equally to AI produced works, albeit that we do not necessarily believe</p>

	that works produced autonomously by AI should be afforded equivalent protection to works involving human creativity.
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3. *If we introduce a related right for computer-generated works, as per option 2, what scope and term of protection do you think it should have? Please explain how you think this scope and term is justified in terms of encouraging investment in AI-generated works and technology.*

Definition of computer-generated works

Under the current provisions of the CDPA, copyright protection is granted to LDMA works which are generated by computer in circumstances where there is no human author of the work in the normal copyright sense. “Generated by computer” has not been further defined and in time the phrase itself may be seen as outmoded, however there are advantages to this level of generality. We note that there is currently no universally accepted definition of AI and that any definition would need to be sufficiently flexible to avoid being rendered obsolete by rapidly advancing technology and aligned with other legislation.

At this stage our view is that any related right should be confined to circumstances where there is no human author (where it is possible to identify a human author the existing copyright provisions should continue to apply). However, further consideration should be given to expanding the related right to all types of copyright work and not just LDMA works, as the justification for treating other types of work differently is not immediately apparent to us. See also comments under Duration below.

Author

We believe that the test for authorship as it currently stands under s9(3) CDPA (“the author shall be taken to be the person by whom the arrangements necessary for the creation of the work are undertaken”) is reasonable and provides a degree of certainty given it is an existing concept employed in relation to films and sound recordings; though further clarification in the context of AI use would be welcome, for example:

- In what circumstances would the programmer be regarded as the author rather than the user?
- Could the author of the training data be regarded as the author of the output where an algorithm is simply programmed to create derivative works out of its training data?

Originality

It is not clear whether the normal originality requirement for a LDMA work contained within s1(1)(a) CDPA and as subsequently developed by case law, still applies to computer generated LDMA works as defined in s178 CDPA. There is certainly no express provision which removes this requirement.

It is difficult to foresee in what circumstances the requirement that a work express the intellectual creation of its author could be met where there is no human author. This requirement is therefore not appropriate for computer-generated works which by definition have no human author. One possibility would be the test applied to “entrepreneurial works” at sections 5A, 5B and 6 CDPA, namely that such works should not be a copy taken from another work. This would allow protection regardless of creative input. We understand the arguments in favour of imposing a higher bar given the capabilities of AI to generate vast quantities of works with relative ease (in terms of speed and investment required), however

it may be better to address these concerns by restricting the duration of the right, instead of focusing on the rather human centric concept of originality.

Duration

The duration of protection for computer generated works pursuant to s12(7) CDPA is 50 years from the date the work is made. However, this provision only applies to literary, dramatic, musical and artistic works. There are no separate provisions for computer generated films, sound recordings or broadcasts which presumably remain protected for the same period of time as works created in the normal way. This means that computer generated films and sound recordings that have been published obtain a longer period of protection than computer generated LDMA works. Consideration should be given as to whether there is any justification for this difference between different types of work. It is certainly arguable that a distinction should be made between films which have a human author and films which do not (and therefore by definition are unlikely to involve human creativity in the copyright sense). As noted by Copinger², “the Term Directive appears to provide for two distinct sets of rights in films, one in films as cinematographic or audiovisual works, to be treated as authors’ works, the other in films as the recording of the work, to be treated as a work protected by related rights” with the latter afforded a shorter period of protection.

Any duration of protection should support development in technology whilst continuing to support (and not disincentivise) human creativity. At this point we do not believe that we have the evidence base to understand what this duration should be – but analysis of data in relation to the exploitation of content by rightsholders over time could be used to inform policy as to the appropriate duration of protection, and we would be happy to provide information on our services. Consideration should also be given to precedents such as design right (15/10-year term) and the sui generis database right (15-year term). We are open to the possibility that such analysis could support a much shorter term.

The BBC would be interested in feeding into the evidence base and form of any proposed legislation in this area.

4. *What are your views of the implications of the policy options and of AI technology for the designs system?*
5. *For each option, what are your views on the risk that AI generated works may be falsely attributed to a person?*

At this point in time, we do not think the risk of AI generated works being falsely attributed to a person for the purposes of asserting copyright³ is high – if anything developers currently appear motivated to highlight the involvement of AI.

As such technology becomes commonplace in future, we consider that the risk of false attribution for this reason may increase in circumstances where the difference in the term of protection is significant or no protection is provided for computer generated works. We believe further economic analysis would be helpful in order to determine the extent of the incentive/the point after which the additional revenue earned ceases to be significant. This is something that could be taken into account if a new related right is created when determining the appropriate term.

² Copinger and Skone James on Copyright 17th Ed, 6-76

³ We have not considered the use of deep fakes for other reasons here.

Ultimately a technical solution to this issue may be required. Determining whether or not a work is an AI creation by reference only to the work itself will become more and more difficult as technology becomes more sophisticated and infringement of any legal provisions may go undetected where this is the case.

Copyright – text and data mining (TDM)

6. *If you license works for TDM, or purchase such licences, can you provide information on the costs and benefits of these? For example, availability, price-point, whether additional services are included or available, number and types of works covered by the licence etc.*

The BBC – and its ultimate funders, licence fee payers - have an interest in ensuring that BBC content is protected by copyright in order to protect our investment, and this is the case in TDM as elsewhere. The BBC is a holder/controller/licensor of datasets with its archive being one of the BBC's most valuable assets. We have invested significantly in our datasets (e.g. programme archive) so it is crucial to get the balance and value exchange right both now and in coming years.

The vast majority of our own machine learning projects to date have involved BBC datasets, and this is at least partially due to the cost of licensing third party datasets. In a minority of cases we have licensed datasets, including:

- Audio visual works and subtitles from Yle⁴;
- Sound recordings from the Linguistic Data Consortium⁵; and
- A lexical dictionary from the University of Edinburgh⁶.

Licence fees tend to vary depending on whether the use is perceived to be commercial or non-commercial. Contractual negotiations can be slow and time consuming, which can delay projects.

7. *Is there a specific approach the government should adopt in relation to licensing?*

We recognise that if licensing is left purely to market forces then this may provide a significant advantage to those established entities with greater financial resources at their disposal.

8. *Please rank the options in order of preference (most to least preferred) and explain why.*

Option 1: Improve licensing environment for the purposes of TDM	In the absence of a substantive body of case law providing guidance on their interpretation, the ambit of exceptions can be unclear such that reliance on exceptions is unlikely to provide sufficient certainty in order to form a sound business
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⁴ <https://developer.yle.fi/en/data/avdata/index.html/>

⁵ <https://www ldc.upenn.edu/about/ldc-overview>

⁶ <https://licensing.edinburgh-innovations.ed.ac.uk/i/software/combilex-rp.html>.

	<p>model for the use of vast quantities of copyright works in a single project. We therefore do not believe that reliance alone on exceptions provides a long-term solution to this issue. We believe that a licensing solution for commercial uses may be able to provide the requisite balance between rewarding rightsholders for the use of their works by AI, providing sufficient legal certainty around the mass use of such works and supporting the development of AI technology. Given that this remains a novel area, negotiating bespoke contracts can be complex and time consuming.</p>
Option 0: Make no legal change	<p>There may be some merit in waiting to see how the new EU exceptions develop before making any of the legislative changes contemplated below, but in the interim we would welcome further clarification as to the interpretation of the current exception as lack of certainty has proved to be a bar to us relying on it in the past.</p> <p>We would particularly welcome further clarification of the requirement that the computational analysis must be “for the sole purpose of research for a non-commercial purpose”:</p> <p>The government guidance suggests that as long as the original purpose for carrying out text and data mining is solely non-commercial, then subsequent commercialisations of the outputs are not restricted. We would welcome clarification as to whether this is the case even where some form of commercialisation is foreseeable, although the immediate purpose is non-commercial and the exact form of commercialisation is not known at the time the research takes place. We are also interested to understand whether it would have any bearing if any commercialisation is carried out by a different legal entity.</p> <p>We would further welcome clarification as to whether the relevant commercialisation should be commercialisation of the outputs of the research rather than the use of the outputs in a commercial environment. The BBC is a public service organisation, which is funded primarily by the licence fee but also is required to undertake some commercial activities which are reinvested in our services for the benefit of UK licence fee payers. We believe that the activities of the BBC public service should be considered to fall within the “non-commercial” requirement, including for example use of copyright works by AI systems in order to create content for the BBC World Service website, which is not sold for profit or distributed commercially as such, but does have limited advertising outside the UK.</p>

	<p>We also note the limitations of the text and data mining exception in circumstances where a non-commercial entity wishes to outsource text and data mining research to a third party. The first hurdle is that the entity doing the data mining also needs to have lawful access to the original works. Secondly, as above, it is unclear whether the commercial purpose of the third party carrying out the text and data mining would be the relevant “purpose” rather than the non-commercial purpose of the entity commissioning the research. Thirdly, we would welcome clarification as to the application of s29A(2)(a) (copyright in the work is infringed if it is transferred to another person) where the entity commissioning the research (or indeed a third party) collects the data.</p>
Option 3: Adopt a TDM exception for any use, with a rights holder opt-out	<p>We believe it to be a distinct possibility that the existence of the opt out may render it unworkable for users to rely on this exception for the purposes of training AI algorithms:</p> <ul style="list-style-type: none"> • We would anticipate that a significant number of rightsholders would opt out. • If it is not possible for a user to be reasonably confident that a rightsholder has not opted out (eg because the information is provided in an obscure location), users may not feel there is sufficient certainty to rely on the exception. • Vast quantities of data are required in order to train AI algorithms and it would be incredibly time consuming for users to search for opt out information on a work by work basis. <p>It is also not clear to us how an opt out might work best in practice:</p> <p>Whilst it may be straightforward for rightsholders to include the opt out in their online terms and conditions (industry standard language may develop over time but query whether a statement that the data may only be used for certain specific purposes would be sufficient), it is less clear how this might work where content is made available on a third party platform along with the content of other rightsholders.</p> <p>A centralised register would place an increased administrative burden on rightsholders and effectively introduce an additional formality for rightsholders in order to enforce their copyright (similar to US registration requirements). A centralised register may not be ideal from a user perspective either - audio visual works commonly involve multiple rightsholders, some of which are easier to identify than others. For any kind of central database to work, it would require the user to be able to reliably identify the title and/or the</p>

	<p>rightsholders (including underlying rightsholders) of the works they wish to use.</p> <p>In either case, it is not clear how a copyright owner will be able to ensure that their opt out is adhered to, not least because it may not be possible for the copyright holder to identify whether their works have been used in any given case, particularly taking into account the fact that vast quantities of data are often used and/or once the data has been processed it may become unrecognisable/unidentifiable in the final output. It may be that a technical solution could address these concerns but developing a common standard would take time and resources.</p>
<p>Option 2: Extend the existing TDM exception to cover commercial research and databases</p> <p>Contractual terms restricting the ambit of the existing exception are unenforceable.</p>	<p>At this stage, and subject to the clarifications of the existing exception that we have outlined above, we do not believe that extending the existing exception to cover all commercial purposes would strike an appropriate balance between supporting the development of AI technology and the legitimate interests of rightsholders. Sometimes copyright works form a fundamental part of the development of the AI, for example the use of archive news articles to train translation services which are then monetised. The AI would not be able to function effectively without those works and in such circumstances we believe some kind of value exchange is appropriate. Furthermore, sometimes the aim of the AI is to create output that can be substituted for the original works and is indistinguishable from such works. The law should continue to incentivise works created by humans.</p>
<p>Option 4: Adopt a TDM exception for any use, which does not allow rights holders to opt out</p>	<p>For the reasons given above, at this stage we do not think this would strike an appropriate balance between supporting the development of AI technology and the legitimate interests of rightsholders.</p>

9. *If you have experience of the EU exception with opt out for rights holders, how has this affected you?*

We are planning to opt out.

10. *How would any of the exception options positively or negatively affect you? Please quantify this if possible.*

See question 6 above.

Patents

11. *Please rank these options in order of preference (most to least preferred) and explain why?*

Patent Inventorship	
Option 0	Make no legal change
Option 3	Protect AI-devised inventions through a new type of protection
Option 1	“Inventor” expanded to include humans responsible for an AI system which devises inventions
Option 2	Allow patent applications to identify AI as inventor

The above table is in order of descending preference; explained as follows.

In our view, care needs to be taken to not disrupt the basic tenets of the patent system, in order to accommodate AI technology which may be ultimately incompatible with its underpinnings.

Most fundamentally, the patent bargain – disclosure of a technical contribution to the art for ultimate societal use and benefit, in return for a monopoly over practising that technical contribution for 20 years – looks to be incompatible with incorporating technology that invents in a “black box” and thus obstructs disclosure of its technical contribution. Inventions by AI protected by patents for which the technical contribution is opaque may result in the protection and incentivisation of proprietary systems without the other side of the patent bargain (ie the corresponding benefit to society), which would be contrary to the stated aims of this consultation.

There are also considerable potential difficulties with adapting patent law to incorporate artificial intelligence as an inventor in part or whole. Other well-developed patent concepts and law would also be impacted – including skilled person, common general knowledge and transparency. Such a change may also have a knock on effect on the general level of *human* inventiveness required for entitlement to a patent: by its nature an invention devised by AI may not require the same level of human inventiveness as an invention devised by a natural person, the inventiveness being provided by the AI. Query whether it is then appropriate that such patents be granted the same term of protection? It is unclear to us how these difficulties could be resolved at present. To incorporate AI transparency (if this is possible) seems likely to involve disproportionate complexity in applications and patents that significantly advantage the largest players in the market and/or lead to decreased patent applications, as organisations seek to protect their algorithms.

We have not seen evidence that deficiencies in the current UK patent system, as concerns AI, have discouraged investment in AI nor undermined innovation. We also believe that under the existing regime a human will qualify as an inventor for most inventions currently made with AI involvement.

On this basis, we believe that the best option at present is to make no legal change.

To the extent that change is required, the BBC sees good arguments for a *sui generis* right covering AI production of products or processes, in order to reward and incentivise investment in AI which solve technical problems. This would allow more flexibility to create a

bespoke regime rather than stretching the existing patent regime which has been formulated around human centric concepts. If the UK wants to lead in this area, having a standalone right with clear rules would make it easier for other countries to replicate than if the rules are intertwined with existing patent rules.

We acknowledge that there are also potential negative aspects associated with introducing a new sui generis right, such as uncertainty while law develops including any novel concepts or terms (as observed with the sui generis database right) and the risk that UK law will diverge from other jurisdictions. However, it seems to us that there is no easy way to “tweak” the current law to accommodate AI and if the UK wishes to lead in this area, a certain amount of risk will have to be taken that others will follow.

See answers to 16 and 17 below as regards the potential scope of such a right.

12. *Would the changes proposed under Options 1, 2 and 3 have any consequential effects on the patent system, for example on other patentability criteria?*

Assessment of novelty and inventive step, in particular, are problematic in terms of the “black box”/disclosure of invention issue as outlined in answer 11 above.

For options 1 and 2:

13. *If UK patents were to protect AI-devised inventions, how should the inventor be identified, and who should be the patent owner? What effects does this have on incentivising and rewarding AI-devised inventions?*

The BBC is not in favour of options 1 or 2. Should either be taken forward, the formulation “the natural person who made the arrangements necessary for the AI to devise the invention” would appear a test worth considering to identify the inventor and/or patent owner.

14. *In considering the differences between options 1 and 2, how important is it that the use of AI to devise inventions is transparent in the patent system?*

See answer to 11 above.

15. *Would the UK adopting option 2 affect your global patent filing strategy, if so, how?*

Option 2 would act to the detriment of the BBC’s global patent filing strategy and the place of UK patents within it.

The BBC routinely files patents across a number of jurisdictions. Oftentimes our priority patent is applied for within the UK and then used as the basis of a PCT application.

As noted in the Open Consultation document dated 29 October 2021, 80% of the world’s patent applications require the patent inventor to be human. Should the UK position diverge from key patent jurisdictions (a) costs will be increased and delays incurred with the need to file different types of patent applications – especially where UK patents could invalidate non-UK patents by claiming AI inventorship; (b) the priority application is highly unlikely to remain the UK patent and/or (c) it may be best to not file at all in the UK.

It is possible that the introduction of a sui generis right may avoid some of these issues.

For option 3:

16. *What term and scope of protection should a new right offer?*

The BBC sees that a term of a sui generis right might be shorter to reflect the lower level of transparency as to how the invention works (and therefore lower level of societal benefit) and to reduce the risk of cluttering the market, taking into account AI's potential ability to devise inventions at much greater speed and lower cost. However, if the term of protection is too short, it will not incentivise investment.

Economic analysis is required in order to assess what the appropriate term should be, balancing incentivising the technology against restricting competition and innovation by third parties. It may be that analysis as to the current rate of technology obsolescence would also inform this debate.

17. *What should the criteria for grant of a new right be and why? Particularly should it:*

- a) Replicate the current requirements for a patent?*
- b) Set a different bar for inventive step?*
- c) Be an automatic or registered right?*

Any new right should not necessarily replicate the current requirements for a patent – a bespoke right specifically tailored to inventions devised by AI should be considered carefully.

A key rationale underlying the inventive step test is to ensure that the invention has added sufficiently to the current body of knowledge to warrant the benefit of a (monopoly) patent right. In our view some kind of comparable criteria is required for AI devised inventions; however, the appropriateness of the current inventive step test for such inventions requires consideration. For example, the test assumes the common general knowledge of the notional person skilled in the art and then asks whether the difference between the common general knowledge and the invention would have been obvious to that person. There is a question as to whether an objective test based on human skills can be applied equally to an AI invention as it is to a human invention. Further, it may be difficult to make this assessment where technology invents in a “black box”.

Further consideration should also be given to the benefits and risks of an automatic right and whether this may incentivise utilisation and thus investment in AI more effectively than the current system. Removing application/registration formalities could reduce application/registration costs, provide a faster route to protection (many technologies may become obsolete in the years it takes to prosecute and grant a patent) and accommodate technology that invents in a “black box” (avoiding difficulties around providing extensive disclosure of the AI's workings in order to explain its technical contribution).

However, a right that automatically arises on creation may also entail significant risks including the risk that the market will become cluttered. Unlike other rights that arise automatically such as copyright, there is no requirement to actively “copy” the original in order to infringe a patent – a patent provides a total monopoly right whether or not a user is aware of the patent and has deliberately used it or not. Significant downstream costs may be incurred where the validity of the right is subsequently challenged resulting in legal uncertainty in the

interim. Those requiring legal certainty may have to consider obtaining licences in any event, which could be costly and may result in licences being obtained where the “invention” does not legitimately warrant protection. It may be possible to mitigate some of these risks by providing for a shorter term and/or narrowing the scope of protection.

As per the impact statement this option is not fully formed at this stage, therefore further consideration and consultation is required to examine the potential terms, risks and benefits.

General

18. What role does the IP system play in the decision of firms to invest in AI?

This is a broad general question and may of course vary with the type of AI, its functions in a particular sector, its stage of development and business potential. However, the IP system potentially has an increasingly important role to play in the decision of firms to invest in AI. An assessment of a company’s value takes into account the value of its assets and the extent to which assets (including AI) are protected by the IP system will have an impact on that value. Businesses may take this into account when deciding whether to invest in AI. The BBC also acknowledges that there are currently businesses willing to invest in AI and offer access on an open source basis, encouraging collaboration and the development of technology in this way.

19. Does the first mover advantage and winner-take-all effect prevail in industries adopting AI? How would this affect the impact of the policy options proposed on innovation and competition?

20. How does AI adoption by firms affect the economy? Does the use of AI in R&D lead to a higher productivity?

21. Do the proposed policy options have an impact on civil society organisations? If so, what types of impacts?

Section B: Respondent information

A: Please give your name (name of individual, business or organisation).

[REDACTED]

B: Are you responding as an individual, business or on behalf of an organisation?

1) Business – British Broadcasting Corporation

2) Organisation – please provide the name of the organisation

3) Individual – please provide your name

C: If you are a responding on behalf of an organisation, please give a summary of who you represent.

D: If you are an individual, are you?

1) General public

2) An academic

3) A law professional

4) A professional in another sector – please specify

5) Other – please specify

E: If you are responding on behalf of an organisation, are you?

- 1) An academic institution
- 2) An industry body
- 3) A licensing body
- 4) A rights holder organisation
- 5) Any other type of organisation - please specify

F: If you are responding on behalf of a business or organisation, in which sector(s) do you operate? (choose all that apply)

- 1) Agriculture, forestry and fishing
- 2) Mining and quarrying
- 3) Manufacturing – Pharmaceutical products
- 4) Manufacturing – Computer, electronic and optical products
- 5) Manufacturing – Electrical equipment
- 6) Manufacturing – Transport equipment
- 7) Other manufacturing
- 8) Construction
- 9) Wholesale and retail trade; repair of motor vehicles and motorcycles
- 10) Transportation and storage
- 11) Information and communication – Publishing, audio-visual and broadcasting
- 12) Information and communication – Telecommunication
- 13) Information and communication – IT and another Information Services
- 14) Financial and insurance activities
- 15) Real estate activities
- 16) Scientific and technical activities
- 17) Legal activities
- 18) Administrative and support service activities
- 19) Public administration and defence
- 20) Education
- 21) Human health and social work activities
- 22) Arts, entertainment and recreation
- 23) Other activities – please specify

G: How many people work for your business or organisation across the UK as a whole? Please estimate if you are unsure.

- 1) Fewer than 10 people
- 2) 10–49
- 3) 50–249
- 4) 250–999
- 5) 1,000 or more

H: The Intellectual Property Office may wish to contact you to discuss your response. Would you be happy to be contacted to discuss your response?

Yes

I: If you are happy to be contacted by the Intellectual Property Office, please provide a contact email address.

[REDACTED]

J: Would you like an acknowledgement of receipt of your response? **Yes**