

## Annex - Response form

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](mailto: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.

<b>Computer generated works</b>	
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

<b>Text and Data Mining (TDM)</b>	
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

<b>Patent Inventorship</b>	
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?*

We do not currently but may seek to in the future.

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

We favour option 0. As a business that relies on monetising content we would generally oppose any weakening of protection in this area.

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.*
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?*

## **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.*

We have currently one arrangement where we are licensing data to a university for this purpose. We are not charging for this access but have agreed that any future monetisation of the application would result in payment to us on a revenue share basis.

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

The current legal framework is adequate for our purposes, but we do recognise the need to get ahead of innovations in this area so welcome further consultations and research.

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

We would favour no change in the law but if there is a change, the opt of for rights holders would be our preferred option. We would oppose options 2 and 4.

9. *If you have experience of the EU exception with opt out for rights holders, how has this affected you?*
10. *How would any of the exception options positively or negatively affect you? Please quantify this if possible.*

Any option that meant that our content (which is widely disseminated across a large number of customer's properties online) had less protection than it does now would deny us the option to monetise such use. This is something we are actively pursuing.

## **Section B: Respondent information**

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

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

**1) Business – please provide the name of your business**

**PA Media Group Limited**

2) Organisation – please provide the name of the organisation

3) Individual – please provide your name

**C:** If you are 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**

**A private limited company in the business of licensing content including text, pictures, video and data.**

**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

**We are the UK's national news agency.**

**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?

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

**J:** Would you like an acknowledgement of receipt of your response? No