

Speeding Up: Are PPHs Better Protecting Patents?

Patent practitioners engaged in patent prosecution and lawmakers alike have been aiming for a global reach for patents, as highlighted by the IP5 PPH and Global PPH agreements entering into force recently. **Amanda Shuai** asks experts if PPH agreements are working as intended.

Many Asian countries have entered into Patent Prosecution Highway (PPH) agreements with each other and with European and US patent offices to enable patent

allowable claims in one country's patent office to obtain accelerated prosecution of corresponding claims in another country's patent office. This enables patent owners to obtain a patentability decision in the latter patent office more quickly, which could be essential in certain market sectors, says Kenji Sugimura, president of Sugimura International Patent & Trademark Attorneys in Tokyo.

The necessary condition for applying through PPHs is that at least one claim should be evaluated to be positive in the search and examination report of the Office of First Filing (OFF) for granting a patent, says Duan Xiaoling, a senior partner and head of the patent team at Wan Hui Da in Beijing. Otherwise, it would be impossible to initiate an application through such a route.

Moreover, the PPH programme is not applicable if the positive examination results from the Office of Second Filing (OSF) have been issued earlier than the OFF. However, whether the examination

applications to request a fast-track examination procedure at the corresponding office.

PPH programmes allow for patent owners to leverage

results from the OFF could come earlier is out of applicants' control and, sometimes, beyond their expectation, says Fred Yen, managing partner at Tai E International Patent & Law Office

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Being part of a PPH programme often gives an Asian country an edge over its own examination standards due to the high quality of the USPTO and EPO's search and examination practice.

*- Meenakshi Khurana, partner,
Khurana & Khurana, Noida*

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in Taipei.

The enhanced PPH system – the PPH Mottainai Pilot Programme – should be able to tackle this issue. According to Yen, under the Mottainai programme, an applicant can request advanced examination with any participating office if the first favourable examination results are issued from any participating patent office.

Fast-Track Prosecution

Since patentability requirements around the globe are largely uniform, sharing search or examination results of one patent office with another patent office definitely provides accelerated, cost efficient and at the same time quality patent protection, says Meenakshi Khurana, a partner and a patent attorney at Khurana & Khurana in Noida. Especially when an Asian country enters PPH programmes with US and European offices, she says it gives an edge over the examination standard in the Asian country due to high quality of the USPTO and EPO's search and examination.

"The PPH arrangement allows the search and examination

results of the OFF to serve as a jumping off point for the OSF corresponding application, thereby reducing the OSF's search and examination workload and potentially increasing patent quality," says Miaw Lin Soh, department head – patents at Advanz Fidelis in Kuala Lumpur.

PPH allows participating patent offices to share prior art and examination information. Thus, an OSF can use the prior art search and the examination proceedings of the OFF, which accelerates the examination process, says G Deepak Srinivas, a partner and head of the patent team at LexOrbis in New Delhi. "This also decreases the number of office actions in the OSF, thus reducing the time for pendency of the application and total cost incurred on patent prosecution."

According to Yen, the Taiwan Intellectual Property Office (TIPO) has modified its original PPH programme to the PPH Mottainai pilot programme in line with Japan Patent Office (JPO) and the Spanish Patent and Trade Mark Office. If Taiwan is the OFF for the patent application under the PPH system, to shorten the long examination pendency at TIPO, Yen says the applicant

Countries Without PPH Agreements

Despite Patent Prosecution Highway programmes providing an option for potential patent owners to expedite the examination of their applications, there are other platforms which can provide a similar approach when a PPH programme is not available.

While Malaysia is not yet a party to any PPH agreements, the Intellectual Property Corporation of Malaysia (MyIPO) is in the practice of adopting the examination results of the European Patent Office, the UK Intellectual Property Office, the US Patent

The benefits from relying on the work already done by the more experienced patent offices include a cheaper and expedient examination process. There may be greater confidence in the validity of the patents granted under the modified examination procedure, says Timothy Siaw, a partner at Shearn Delamore in Kuala Lumpur. However, "an over-reliance on foreign patent offices' work may impede the development of patent examination skills in Malaysia."

In the ASEAN region, a useful system is a regional work-sharing programme among nine participating ASEAN member states' IP offices, called ASEAN Patent Examination Cooperation (ASPEC). ASPEC is similar to a PPH system, or rather a global PPH system, for the nine states within the ASEAN region. This has been particularly successful for applications which are first examined in Singapore; the other regional applications in Vietnam, Thailand, Indonesia, Malaysia, the Philippines, Brunei, Cambodia and Laos are then examined with reference to earlier work done by the Intellectual Property Office of Singapore (IPOS), thereby greatly expediting grant in these countries, says Adam Bogsch, managing partner at Viering, Jentschura & Partner

in Singapore.

Bogsch says advantages to the ASEAN system include the capacity of IPOS to generate high quality reports in a short turnaround time; the system operates in the English language; and the agreement dictates that ASPEC cases must be expedited and examined out of turn at the OSF. He notes that the timing of filing the ASPEC request should be properly coordinated in the respective ASEAN countries such that it is filed before the final decision of grant or refusal.

- Amanda Shuai

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and Trademark Office, IP Australia, the Japan Patent Office, and the South Korea Intellectual Property Office under the country's optional modified examination procedure, says Zaraihan Shaari, a partner at Shearn Delamore in Kuala Lumpur.

Shaari says that MyIPO will defer to the examination results from the prescribed jurisdictions if the modified examination procedure is elected and is likely to grant the application if the same claims have been granted by the aforementioned offices, with some exceptions. For instance, she says software patents and methods of treatment are not patentable subject matter in Malaysia.

can file a request for the TW-Support Using the PPH Agreement Examination Program to have the notification of responsive examination opinions issued within six months. The positive

The average number of office actions issued by the JPO is also reduced with the use of PPH programs. According to Chen, the average number of office actions issued by the JPO for a PPH application is between 0.5 and 1.01, while the average number of office actions issued by the JPO for one case is 1.10. This reduction in time and the number of office actions correlates to a reduction in cost for clients, she further notes.

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Recognizing Examination Results

Noticeably, PPH is a means to accelerate patent prosecution procedures, but it does not mean there is mutual recognition of search and/or examination results on substantive issues, says Duan. “That is to say, the application which meets the requirements for PPH can enter into the substantive procedure earlier and be examined faster. However, offices still have to make substantive examination or registration in accordance with national patent law or perform other review

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notification can help advance the examination procedures of the corresponding patent application through the PPH.

The PPH system is useful where expedited examination is the main concern and where it is possible to obtain fast examination results in one country based on which a PPH request can be filed in another country. For example, for applications first filed in Singapore, Audrey Goh, a partner at Viering, Jentschura & Partner in Singapore, says the use of the PPH system may be beneficial as Singapore currently has, with its relatively recently-established Search and Examination Unit, the capacity to generate high quality reports in a relatively short time due to the number of examiners and the lack of a backlog. The applicant is then able to use the Singapore search and examination results in countries which have PPH relationships with Singapore.

According to TIPO statistics compiled over the first half of 2014, PPH applications in Taiwan have the average pendency of 4.19 months from filing the PPH request to the issuance of final decision. Clearly, Yen says, the PPH route is much faster compared to the average pendency of 39.8 months for non-PPH applications.

While many PPH agreements are only bilateral rather than multilateral (and applicants must therefore navigate multiple PPH programs), the reduction of time is still apparent. According to Rebecca Chen, foreign counsel liaison at Sugimura International Patent & Trademark Attorneys in Palo Alto, California, one of the firm's clients received a Notice of Allowance 10 days after submitting a request for an accelerated examination under the PPH programme. She says the average PPH pendency period is four to seven months, compared to the average 22 months pendency until final decision is issued by the JPO.

procedures for the patent applications.”

Sometimes it can be discouraging, especially for the client, to get the promised fast action but have it turn out to be a rejection, says partner Jeffrey Ingerman at Ropes & Gray in New York.

Although one office's examination result is not binding with any other offices, examiners may refer to their foreign counterparts' examination, and it may save time for the examiners as well, says Lena Shen, a partner at Sanyou Intellectual Property Agency in Beijing. According to Shen, 70% of the office actions her firm

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received from PPH applications concern formality issues. There is usually no challenge of novelty or inventive step issues.

When the search and examination ability of the second patent office is lower than that of the first patent office, the second patent office is likely to respect the examination results from the first patent office, says Akio Takahashi, a patent attorney and representative partner at Global IP in Tokyo. Accordingly, he says, the total number of office actions might be reduced, which helps to reduce the total cost and time before grant.

David Hunjoon Kim, a partner and attorney-at-law at You Me Patent & Law Firm in Seoul, says he has noticed that different jurisdictions have differing degrees of recognition towards other jurisdictions' examination results, as shown from the allowance

to enter into a PPH agreement with Japan. "We are of view that more PPHs will be extended to other countries in Asia," she says.

Many Asian countries are part of a number of PPH bilateral or multilateral agreements with other countries. Srinivas says his Japanese experience, in particular, is quite encouraging for PPH supporters. In Japan, a technology-based economy, implementation of PPH programmes by the JPO has significantly accelerated the patent examination process, reduced the backlog of applications and improved patent quality.

Japanese companies are expanding their overseas business activities and increasing the number of patent applications filed with foreign patent offices. PPH programmes are a popular tool for Japanese clients for expedited examination procedures, says Sugimura.

"In fact, the use of PPH programmes is more popular in Japan than in the United States or Europe."

As of last year, Sugimura says, Japan-originating applications accounted for nearly 24,000 PPH requests, including PPH and PCT-PPH.

However Aki Ryuka, a patent attorney at Ryuka in Tokyo, says PPH programmes do not work well in Japan when it comes to obtaining an allowance. "In Japan, PPH works for nothing more

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rates of applications without the issuance of office actions. For example, he says the USPTO's allowance rate for PPH programmes is between 70 to 80% within four to five months from filing dates. However, for other countries, such as Japan, the allowance rates and backlog times are not distinguishably better than filings without PPH, Kim says. As such, "we can say that having a PPH programme does not necessarily mean the process will be faster. It really depends on how the country's patent and trademark office recognizes other offices' examination quality."

It seems that most examiners, if not all, in those countries that permit PPH do not give much weight on the fact that other country has allowed the claims and granted a patent, says Qian Huang, a partner at Pillsbury Winthrop Shaw Pittman in Washington, D.C. The examiners still perform search and issue office actions as if the claims were not granted in any country. Although paying a high PPH fee may get the first office action faster, there is no other discernible advantage to it at this point, she says. "In fact, when we inquired about PPH use with EU law firms and Chinese law firms, the response was unanimous – not worth it. Our experience of using it evidences the same."

Applicants Across and Beyond Asia

An increasing trend in the use of PPH programmes can be seen in the ASEAN countries, says Chien Nee Yew, a senior associate at ADIPVEN in Kuala Lumpur. For example, Singapore entered into the PPH agreements with the US and Japan in 2009, and later with Korea in 2013. The Philippines, on the other hand, rolled out PPHs with Japan and the US in 2012 and 2013, respectively. In 2013, Indonesia initiated a PPH programme with Japan. Earlier this year, Thailand was the most recent country

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than mere requesting for acceleration, and we generally suggest using the request for the accelerated examination rather than PPH, because it is less expensive and the applicant can amend claims differently in Japan."

Many South Korean and US applicants have benefitted from the bilateral PPH programme between the two countries since it entered into force in 2008. According to Kim, Korean patents could be issued within three to five months in the US via the PPH route. Moreover, it is possible to have both Korean patents and US patents allowed within one year from the earliest filing date. As a result, he says some American applications would file their first patent applications in South Korea using the expedited examination after obtaining Foreign Filing Licenses from the US patent office, and then go back to the US through the PPH system

to have their corresponding US patent applications allowed.

Yew says that PPH programmes do benefit her clients as the examination process in the OSF can be expedited relying on

In addition, Srinivas says some claims may be patentable in one country but not patentable in others or may have to be amended to be patentable. “The difference in patentability standards and examination procedures across the participating patent offices poses a serious challenge to PPH programmes.”

India has a unique section in its Patents Act with respect to pharmaceutical inventions, which bars patentability to new forms of known substances unless there is a significant enhancement in efficacy of the new form, according to Khurana. For instance, a Novartis patent application on the beta crystalline form of imatinib mesylate (marketed as Gleevec) was rejected in India but allowed in over 40 other countries. Thus, in countries having such conflicting patentability criteria, she says PPH programmes may not be useful as each country will have to do the search and examination according to their own statutes.

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the examination results of the OFF, based on her experience handling patent applications in many Asian countries in which PPHs are available with each other and with the US Patent and Trademark Office (USPTO) and/or the European Patent Office (EPO).

Disadvantages and Limitations

On the flip side, Duan says that the applicant sometimes has to narrow the scope of protection in the OSF in order to be sufficiently corresponding to the claim basis which has been searched and examined by the OFF.

This could result in less protection than might otherwise have been obtained in the OSF, depending on the OFF patentability requirements in contrast with OSF patentability requirements, says Soh.

As such, Chen says clients have to choose between obtaining less coverage for their invention to comply with the requirement for faster prosecution and greater coverage without the benefit of expedited examination.

The choice of the OFF becomes important as some claims may be more appropriate for acceleration in one jurisdiction over another, Srinivas says. Further, he says the chosen OFF must be one which has expeditious examination process as examination delays in the OFF may curtail potential advantages of PPH programmes.

The quality of the OSF examination might be potentially compromised because of the over-reliance of the OSF on the OFF. Yew explains that when an OSF is overly-reliant on an OFF, this could lead to a trend of an increasing amount of prior arts not being examined nor cited in search and examination reports. The OFFs tend to focus on their own country's patent documents and/or literature. As such, Yew says, the US cites non-US prior art less than 10% of the time, whereas Japan and South Korea mainly cite Japanese and South Korean prior art, respectively.

Time and Cost Reduced?

From the perspective of the countries in which PPHs are available, Yew says the official fees and the legal fees in the OSF can be reduced together with the shorter time involved in receiving the first office action, as in comparison with countries in which PPHs are not available.

“From our experience of filing patent applications in the US through PPH, it reduces, on average, about one office action per application,” says Kim. “As the average cost for responding to an

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LexOrbis, New Delhi

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office action in the US is about US\$3,000, this means that even after subtracting the cost for requesting the PPH, applicants can still enjoy about US\$2,000 saving per filing. As for the time, we observed that almost 12 to 16 months of backlog time is reduced by applying for a PPH into the US.”

While some experts find PPH programmes helpful in reducing time and cost, others have had different experiences.

Aaron R Wininger, a partner and office representative at Perkins Coie in Shanghai, says he does not see any reduction in cost. Instead, he says, there is often an acceleration of costs because

of expedited examination, such as attorney fees for office action responses. “While theoretically results from earlier examination can be re-used so that rejections are minimal, in actuality, PPH only guarantees expedited examination, not expedited allowance or grant. China is free to do their own search and come up with their own independent rejections even if the office of first filing allowed the application.”

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If applying via a normal route without PPH, all one has to do is to submit the Patent Cooperation Treaty (PCT) application, and there is no other cost incurred to amend the claims. Under PPH programmes, Huang says her clients have to use attorneys to make sure that the claims granted in another country are submitted with a preliminary amendment. At the same time, the claims submitted via PPH still have to comply with local laws, such as the limit on the number of claims, she says. All those incur time and costs which do not exist when applying via the normal PCT route.

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Language Differences

Different languages have also posed challenges for PPH applications. A new reference found in one country may invalidate the corresponding patent that has been issued in another country. Ryuka says this happens more when the examiners in the two countries search prior arts in different languages, and says that Japanese language references are often found after a US patent is issued. As the US examiners do not search Japanese language references, the Japanese references may invalidate the US patent.

Ryuka says this problem can be avoided by accelerating the Japanese examination, and submitting the references found in Japan to the USPTO before the US patent is issued. The resulting US patent is more likely valid.

China-Related Challenges

Normally, the foreign corresponding application will be

amended more or less so it is almost always necessary for the applicant to amend the Chinese application to keep in conformity with the foreign application, says Shen. Therefore, she says, the timing of amendment and the timing of PPH request filing is important.

In China, applicants can only voluntarily amend their claims when requesting examination and within three months of receiving a notice of entering substantive examination. Wininger says that if an applicant is past the voluntary amendment deadlines, it cannot amend its Chinese claims to match the allowed US claims.

For Chinese applications, only two chances are given to the applicant. If all the requirements are not met at the second chance, the request for PPH will be rejected, says Xi Bing, a patent attorney at Unitalen in Beijing.

Due to restrictions on timing, the PPH is more advantageous for Chinese applicants going to the US than vice versa, says Wininger. He says that applicants may want to pick an “easy” jurisdiction to get an indication of patentability and then use that to expedite examination in other countries. For example, one might want to select South Korea as international

search authority for PCT applications, available to US applicants, Australian applicants, Singaporean applicants, and others.

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PPH or Not?

If clients wish to have patents granted quickly and have already filed or plan to file corresponding applications in another country or jurisdiction, Sugimura recommends they pursue expedited



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- Mark Roberts, partner,
Davies Collison Cave, Melbourne

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examination via a PPH programme. “It is much less burdensome for applicants than a similar request for expedited examination via the accelerated, preferential, or super accelerated examination programmes,” she says.

For enforcement purposes, PPH applicants may wish to have the patent granted early, as they may have discovered infringing activities or they may need the patent certificate urgently for other

needs, says Shen.

"The faster the grant means the sooner you can enforce," says Wininger. Also, if clients plan on launching a product in China, he says they may want their patents granted faster via PPH so they can mark their product and enforce the patent against copycats.

The PPH is going to be of particular interest to clients who are looking for investment to fund their new technology development. "Clients are therefore looking to have patents granted as soon as possible to assist in convincing investors that there is likely to be a period of market exclusivity around the product in important

at the national phase.

In contrast, IP5 PPH and Global PPH arrangements formalize fast-tracking through use of PCT work products in relevant countries, says Soh. "It should be noted however that not all PCT countries are party to the Global PPH and IP5 PPH programmes. Also, these programmes are largely equivalent to each other in form and effect, which creates a potentially unnecessary duplication of routes to achieve expedited examination."

Considering that the standard of patentability in each country is dependent on its development objectives, Srinivas says standardization of practices at the global level may affect flexibilities at the national level and may pose to be a major challenge for permanent implementation of both Global PPH and IP5 PPH.

With the great improvement of the efficiency in issuing the first examination results, some participating patent offices may usually account for a majority of world patent searches and opinions and further dominate the criteria for patentability at other patent offices involved in the programme, says Yen.

Likewise, Yen says some giant patent applicants may also, within a shorter period of time than at present, obtain a greater number of patent rights from different participating patent offices. "With extreme scenarios, the PPH programme boosting value of innovation could possibly accelerate and strengthen the growth of industrial profits overwhelmingly. Such impact might reshuffle the current global market where

some companies would arise from acquiring ever-stronger patent portfolios, while others might become marginalized."

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Despite the improvements, this progress, along with the fact that most PPH programmes are bilateral agreements between two countries, has resulted in the juggling of multiple PPH programmes, each with their own particular requirements.

- Rebecca Chen, foreign counsel liaison,

Sugimura International Patent & Trademark Attorneys,

Palo Alto, California

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jurisdictions," says Mark Roberts, a partner at Davies Collison Cave in Melbourne.

Kim says he would recommend PPH programmes to clients in high-tech industries where the life spans of inventions are rather short. Moreover, he recommends PPH programmes to clients that are already embroiled in litigation and want to strengthen their patent portfolios quickly, as well as individual inventors who do not have significant financial means. In all these circumstances, "we recommend clients to also file patent applications in the normal process to ensure that they have additional opportunities to amend their applications, as relying on applications filed through the PPH could end their amendment opportunities too soon."

In the meanwhile, applying through a PPH programme means paying high fees and doing a significant amount of work right at the outset of the application, which may not be a good idea if the applicant needs more time for research, and the application includes very theoretical and conceptual specification, says Srinivas.

Impacts of GlobalPPH/IP5 PPH

There is also an impact here with regards to the current PCT which allows member countries to file an international application to obtain a priority date to enter national phases of the application. According to Soh, the written opinion of the international searching authority or international preliminary examination reports provided by international preliminary examining authority under the PCT route may be of value to national patent offices but do not entitle parties to request fast-tracking of applications

Multi-Direction Highways: IP5 PPH and Global PPH

Since the introduction of the first PPH programme, continuous enhancements have been introduced, to include the Mottainai model and subsequently the PCT-PPH model. Each new rendition of the PPH programmes has been an improvement over its predecessor, says Chen. The Mottainai model eliminated the requirement that the positive ruling on patentability had to come from the OFF while the PCT-PPH model further expanded the use and efficiency of the PPH programmes by enabling clients to rely on the positive search and examination reports from PCT international search authorities.

Despite the improvements, this progress, along with the fact that most PPH programmes are bilateral agreements between two countries, has resulted in the juggling of multiple PPH programmes, each with their own particular requirements, says Chen.

She says the IP5 PPH and the Global PPH programmes are designed to overcome this problem and to streamline the process for applicants and patent offices.

The Global PPH and IP5 PPH pilot programmes commenced on January 6, 2014. Presently both programmes are being run on trial basis so as to evaluate their feasibility and determine the possibility of fully implementing these programs on a global scale, Srinivas says.

IP5 PPH extends bilateral agreements to a multilateral one.

Participating offices include EPO, China's State Intellectual Property Office (SIPO), JPO, USPTO and the Korean Intellectual Property Office (KIPO). The search and/or examination results among the five offices can be shared, which becomes more convenient and saves resources, says Duan. "Before that, there was no PPH programme between SIPO and EPO, so IP5 opens the gate for European patent applicants to expedite their patent granting procedure."

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This could encourage the applicants to file via PPH in the countries which they are reluctant to due to the cost and time in relation to the normal route of the examination concerned.

- Chien Nee Yew, senior associate,
ADIPVEN, Kuala Lumpur

As for the Global PPH programme, it is the elongation and expansion of IP5 PPH and it is an inevitable trend for PPH programmes, says Duan. Wide application through the Global PPH system would assist harmonization of the examination standards. Both offices and applicants would benefit from such programs as well, she adds.

The advantage of the proposed IP5 PPH is that examination in the OSF can be expedited as the examination results of the OFF in the IP5 are persuasive in many countries, says Yew. "This could encourage the applicants to file via PPH in the countries which they are reluctant to due to the cost and time in relation to the normal route of the examination concerned."

Having a unified PPH programme consisting of all the interested patent offices would no doubt accelerate patent prosecution more efficiently than the earlier system of one patent office having multiple PPHs with distinct requirements, says Srinivas. "It would, however, require a certain amount of homogeneity in patent examination procedures and standardization of substantive criteria to assess patentability, across the participating offices."

More Countries Involved

Hiroyuki Hagiwara, a partner at Ropes & Gray in Tokyo, says while these improved PPH programmes eliminate the need for bilateral agreements, applicants still need to apply for treatment individually. Thus, the practical effect is only in simplification based on the procedures being identical in all member jurisdictions. Of course, if a jurisdiction not party to a bilateral agreement joins one of these arrangements, that is obviously an improvement, he says.

Japan is a member of both the IP5 PPH and the Global PPH programmes. The substantive provisions of the two programmes are essentially identical, only differing in the membership. Bilateral PPH agreements between Japan and non-participating jurisdiction are still in force. As such, there is

still room for improved efficiencies and the creation of a truly global programme, but the IP5 and Global PPH programmes are already a great improvement upon previous systems, says Chen.

"As efficiencies and work-sharing between patent offices continue to increase, it will be interesting to see the different initiatives that result," says Chen.

So far, South Korea and the EU have not entered into a bilateral PPH treaty. The IP5 PPH multilateral treaties would certainly allow a greater window for South Korean applicants to enjoy the benefit of PPH programmes, because South Koreans file many applications to the EPO, says Kim. Since this is a very recent development, he says he has not seen much collaboration so far. "We nonetheless expect to see backlogs from patent filings of IP5 countries to be reduced significantly. Our only concern is how the EPO examiners will recognize KIPO's examination results. We hope mutual recognition is granted to promote efficiency in their processes."

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As its implementation in Australia relies upon filing a request for PPH examination of an application before examination of the Australian application has commenced and there is already an indication from the patent office of allowability on a corresponding application, there are only a relatively small proportion of cases for which the PPH has so far been used, says Roberts. Nonetheless, he says he has already seen that the system can speed examination and reduce costs for applicants.

Harmonization of patentability standards and examination procedures across the world may not seem feasible at this stage, but Global PPH and IP5 PPH present an opportunity for the patent offices around the world to arrive at a consensus on adoption of "voluntary best practices" in examination of patents which would provide a much needed boost to innovators world over, Srinivas says.

WIPO should take the lead in encouraging more countries to explore the options of PPH, whether it is via bilateral, multilateral or global, says Yew. In addition, Yew says WIPO should also work out a framework whereby the issues in relation to the substantive laws of the countries in PPH programmes could be addressed or minimized to encourage more applicants to use the PPH route. **AIP**



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