

Working Group on the Digital Access Service for Priority Documents

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WIPO DAS IMPROVEMENTS INCLUDING "ROUTE D" PROPOSALS

Proposal submitted by Japan

BACKGROUND

1. Priority Document eXchange (PDX), including the WIPO's Digital Access Service (DAS), can not only reduce the workload for the procedure of user's obtaining and submitting a priority document on paper, but also contribute to make the administrative procedure more efficient, resulting in benefitting both parties. Therefore, an expansion of the framework should be welcomed since these advantages will be penetrated into many users and new participating Offices. Not only that, for the existing participating Offices which have already launched PDX, such expansion would enhance further efficiency due to an increase in counterparts of PDX.
2. Priority Document eXchange started as a bilateral approach, and some of the Offices have been already exchanging a volume of priority documents. However, aiming at further expansion toward the future, DAS, which is the hub-base data exchange through WIPO, would be more suitable than multiple bilateral connections that each Office has to make with every single new participant. In fact, Finland having launched DAS service in April 2011, currently eight countries and organizations are operating this service, indicating steady growth and further expansion toward the future.

3. Furthermore, the frequency of DAS usage has been gradually increased. Tables 1 to 3 show the accumulated DAS usage frequency as of February of 2011 presented by WIPO. It is noted that the usage frequency is especially high for PCT international applications since the Priority Document eXchange framework for PCT international applications had not existed before. Yet, compared with the existing bilateral PDXs where thousands to tens of thousands of applications are exchanged annually, DAS usage frequency is obviously low, most of which accounts for PCT users.
4. As one of the major reasons, DAS usability is not so good in comparison with bilateral PDX. That is, the procedure of bilateral PDXs is easier to handle for users, and this is why DAS cannot be replaced with the bilateral PDXs which are handling a volume of priority 4 documents. In addition, it has been pointed out that DAS has potential security risks.
5. Considering all, DAS improvement aiming at promoting DAS use would be proposed.

Table 1 – The number of priority documents registered on DAS by OFF

OFF	Registered documents
AU (Route A)	52
ES (Route A)	227
GB (Route A)	5203
IB (Route A)	27
JP (Route C)	693
KR (Route C)	3
US (Route C)	1619

Table 2 – The number of priority documents retrieved from OFF

OFF	Successful document retrievals	Successful retrievals following initial failure	Total unsuccessful document requests
AU (Route A)	62	15	1449
ES (Route A)	18	2	301
GB (Route A)	240	32	4075
IB (Route A)	11	3	68
JP (Route C)	607	44	56
KR (Route C)	2	0	79
US (Route C)	1529	327	1227

Table 3 – The number of priority documents requested by OSF

OSF	Successful document retrievals	Successful retrievals following initial failure	Total unsuccessful document requests
AU	0	0	0
ES	0	0	0
GB	43	2	10
IB	2315	414	1455
JP	1	0	19
KR	6	0	88
US	104	7	5683

2. ISSUES OF DAS ARCHITECTURE

6. The issues to be considered in improving DAS, as stated above, are usability and security. Thus, here, the current status and future directions for these two issues will be analyzed.

(1) Usability Issue

7. Although DAS is designed to control access by using an access control list (ACL)¹ and an access code, it does not promise perfect security as described below. Furthermore, feedbacks have been provided by applicants, saying that access control list is not very user-friendly. Access control list is used for the security check in WIPO DAS, and to this end, the information on an applicant and an application should be disclosed to DAS indirectly via OFF or directly from the applicant.
8. In the existing DAS framework, three routes for data transmission, Routes A to C are placed as options to be selected by OFF. In case of Route B and C, information on an applicant and an application is partially / not disclosed to DAS via OFF. Therefore, applicants themselves are required to do the cumbersome procedure in order to disclose information to the DAS.
9. On the other hand, Route A does not require applicants' cumbersome procedure because Offices offer information to DAS on behalf of applicants. For this reason, comparing with Route B and C, Route A has much higher usability. In fact, Table 1 (The number of priority documents registered on DAS by OFF) shows that the number of registered documents of the UK Office which adopts Route A is the most among the participating Offices, which is a clear evidence to support this theory. Furthermore, the Spanish Patent and Trademark Office sets up permission for OSF to access in access control lists, on behalf of the applicant, if so requested by the applicant.
10. Seeing this, adoption of Route A by all the participating Offices may be a solution, to some extent, for usability enhancement. However, adoption of Route A does not solve a problem of potential security risk and imperfectness that access control list may have, and some offices cannot adopt Route A due to legal constraint. Furthermore, Table 2 (The number of priority documents retrieved from OFF) shows that the UK Office, which has the registered documents with the greatest number as shown in Table 1, has less retrieved documents. As is indicated here, Route A forces an applicant to decide whether to file with the OSF when filing with the OFF. As a result, there are many cases where an applicant registers with DAS just in case, although not planning to file with the OSF when filing with the OFF. This means Route A forces an applicant to take the unnecessary procedure, which does not serve as the ultimate solution for usability enhancement.
11. Thus, a new simpler approach replaced with the existing Routes A to C using access control list is needed.

(2) Security Issue

12. In Priority Document eXchange, the following two types of risk exist.
- (a) a risk that irrelevant application may be mistakenly sent to the OSF as a priority document and disclosed to the third party.
 - (b) a risk that despite priority being claimed at the OSF, Priority Document eXchange fails, resulting in lapse of priority rights.

¹ Besides the security check, access control of DAS also provides a function of managing the transmission history.

13. In a case of “b” where priority right will be lost its effect, most Offices have relief measures such as recovery of the priority right, and specific consideration based on the JPO proposal stated later will be described in section 4(4). If this proposed approach being adopted, there is no chance that an improper priority document is mistakenly sent to other Office. Thus, this will not lead to a major problem in the context of security risk that an unpublished document may become available to the third party. Meanwhile, in the case of “a”, a serious risk can be anticipated where a priority document which has not been published at the OFF may have been accessed by the third party, and if the confidential information is leaked through such an erroneous procedure, which will become an irrevocable, critical problem occurs.
14. These risks, both “a” and “b,” are fundamentally different. Therefore, when considering security issue, it is necessary to clearly recognize which type of risk needs to be taken measures for. Here, as mentioned above, the case of “a” is more critical, and thus, it must be considered who should be responsible for avoiding such risk.
15. Under the existing operation of DAS, an access control list is used as the security check. However, since an access control list cannot avoid mixing up the documents which are permitted to be sent to the same OSF, it does not offer perfect security. Therefore, it totally depends on the security check at the OSF (OSF check) to validate whether the sent priority document is correct or not, if further degree of security is required.
16. However, it would be naturally regarded as due care for every Office, as the OFF to take responsibility for performing its own security check to validate the request before sending a priority document. In fact, if an irrelevant unpublished application is sent to the OSF by the OFF and the OSF cannot check it fully after receiving it, it is neither OSF nor OSF applicant, but OFF applicant that is affected by the irrelevant procedure. Thus, the OFF must deal with irrelevant procedure. Considering all, it would be more appropriate to implement the OFF check system, instead of OSF check system, so that the OFF can be fully responsible for sending priority documents properly.
17. Foreseeing the potential expansion of DAS use, the security check should not be dependent on manual check: instead, the automated check system should be considered from the standpoint that it is convenient, while ensuring security. In fact, some Offices exchange thousands to tens of thousands of priority documents annually through the bilateral PDX framework, and it is impossible and unfeasible to manually check such voluminous documents. Furthermore, even though a small number of Offices are involved in the PDX framework, the automated check system can contribute to making the administrative procedure at the Office more efficient.

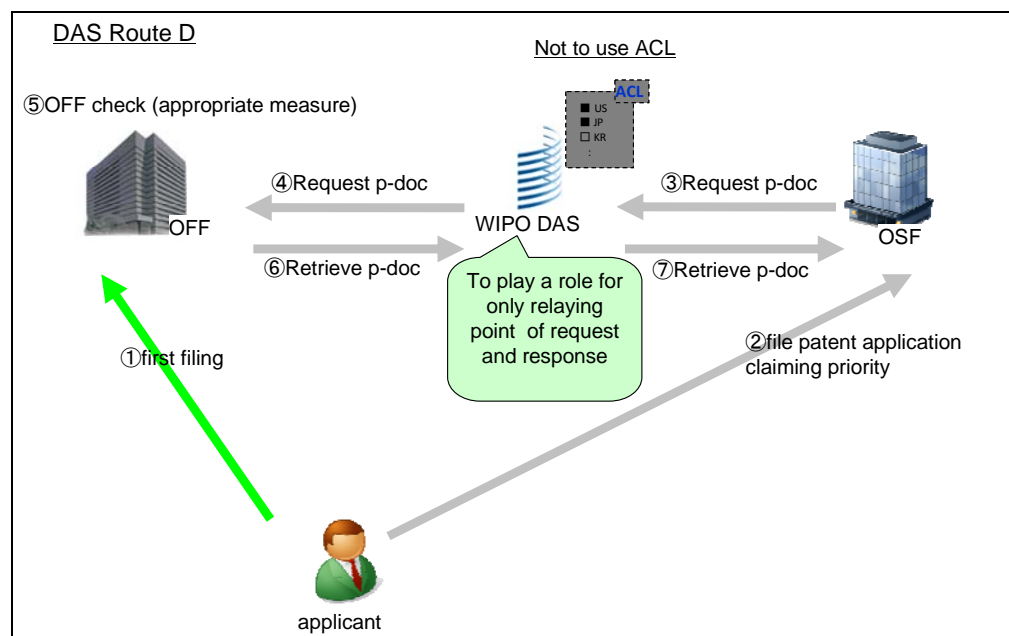
3. PROPOSAL FOR “ROUTE D”

3.1 Summary of Route D

18. In the existing DAS framework, Routes A to C are placed as options to be selected by OFF, as described above. While these three routes are different in who (OFF or applicant) will provide information necessary for the security check for DAS at which stage, but they are the same in terms of being based on the premise that DAS takes partial responsibility for the security check through an access control list.
19. Consequently, the JPO would like to propose a new route, as a promising measure to simultaneously solve the issues for both 2(1) usability and 2(2) security. In this document, the new route is called “Route D” (see Figure 1). In Route D, DAS is basically responsible for relaying the request and respond between Offices, shifting responsibility of security check from DAS/OSF to OFF.

20. In such case that OFF check is performed, since DAS does not need to perform security check, an access control list needs not to be used. As a result, since an applicant does not need to set up his/her own access control list to register his/her information in advance, usability can be improved.
21. It should be noted that Route D can be operated in parallel with Routes A to C, and that Offices which have been already operating any one of Routes A to C can continue to operate the existing DAS as it is without adopting (implementing) any new system. If any Offices desire to operate Route D, they can select or shift to Route D.
22. However, in a case where multiple routes exist, OFF would choose the route, which means that different OFF would take different procedure. The PCT e-Services Helpdesk recorded over 300 queries about how to use DAS over the last year in the context of fewer than 2000 successful document retrievals by the International Bureau during the same period. Considering each office (OSF and OFF) might have received such queries, the total number of queries appeared significantly high. Based on the above discussed facts, it would be highly desirable to adopt Route D as a single solution in order to avoid confusion among applicants and OSFs.

Figure 1 – Proposed DAS New Route



23. Additionally, although Route D will not use an access control list, DAS which is responsible for relaying the request and response between Offices holds the history of request and response. Thus, as an optional service to applicants, a portal to notify the history of sending priority documents can be available, which would be very useful. For the specific implementation methods will be described in "5. Linkage with the account system".

3.2 Method of OFF check in Route D

24. Next, the security check which should be performed at the OFF adopting Route D will be considered. The following options (1)–(3) may be available as the OFF check.

(1) *Route D with Bibliographic Check (Proposal A)*

25. When the OSF requests for a priority document, the bibliographic information held by the OSF is sent to the OFF, and the OFF will compare the bibliographic information sent by the OSF with the bibliographic information held by the OFF for the security check. Priority dates, applicants, or titles of invention are candidates for Bibliographic information to be checked.
26. This measure has an advantage to enhance security without additional burden on applicants. However, the check by priority date enables a complete automated check, while in the major Office where over 1000 applications are filed daily, it is unignorable that unfortunate coincidence may happen where a wrong application with the same priority date is retrieved or sent, indicating that a complete security cannot be ensured. Moreover, regarding the name of applicant or the name of inventor, they are differently spelled due to the language difference or the names may be different depending on the country's law (especially, it should be noted that the inventor is the applicant in the U.S.), or there may be a possibility that the name of invention may be different in the application filed with other country. Considering all, automated check by names is very difficult, and if manual check is adopted for them, the burden on the OFF will become enormously heavy. Furthermore, some OSFs may have legal constraints that do not allow bibliographic information of unpublished application to be disclosed to the OFF, or other OSFs may have need difficult system to provide bibliographic information.
27. Besides, automated check by using descriptions or drawings may be possible. However, it must be stated that automated check will be difficult due to the language difference and technical difficulties.

(2) *Route D with Access Code Check (Proposal B)*

28. The second option is that the existing access codes should function as passwords for the OFF to validate PDRequests, not being used in the DAS portal. This idea was discussed in the last DAS Working Group, and not adopted. Yet, as the result of re-analysing the security and the possibility of error described in 4.(3), this option would be promising OFF check system.
29. The priority document is exchanged as follows:
 - (a) An applicant submits an access code issued by the OFF when second filing.
 - (b) The OSF sends the access code, along with priority number and country name, to the OFF through DAS.
 - (c) The OFF compares the combination between the access code and the priority number sent by the OSF with the combination between the access code and the application number held by OFF for the security check.
30. In this approach, an user does not need to set which Offices are permitted access to the document, and instead of it, an user can simply write an access code in addition to the conventional information including priority number when second filing. In such a simple and clear system, almost perfect security can be obtained, and the burden that an applicant has to carry will be reduced compared with in the case of the existing DAS. (It should be noted that the perfection of security depends on the length and complexity of access codes.) Furthermore, the burden that the OFF has to bear will be also small since the security check will be performed simply by automatically comparing the combination of the access code and the application number sent by the OSF with the combination of the access code and the application number held by the OFF.

31. Moreover, since what is sent from OSF to OFF for security check is an only access code, the legal issue which could be raised in the OSF when bibliographic information of unpublished application is provided does not occur.
32. In the meantime, the OSF needs to make some changes, including changing the application form, which requires the system revision.
- (3) *Route D with Access Code Check realized by "Makeshift Implementation" to write Access Code as a part of Priority Number on Application Form of Second Filing (Proposal B')*
33. Regarding the issue pointed out at the end of explanation about the Proposal B above, the following approach can be considered, where the OSF does not need to change the application form, and introduces access codes while maintaining the existing DAS framework.
 - (a) The OFF will issue an access code responding to the request from an applicant who desires PDX.
 - (b) The applicant fills out the access code followed by the priority number on the application form when second filing. A sample is shown below.

Example:

Foreign Priority Information

<i>Application Number</i>	: 2008-1234XX	DAS:zxbp
<i>Country</i>	: JP	
<i>Filing date</i>	: 2008.03.15	access code

- (c) The OSF sends a request message for priority document with the access code included in the field of priority number (e.g. 2008-1234XX **DAS:zxbp**).
 - (d) The OFF which receives such request message or DAS which relays the message will separate application number (priority number) from the access code, and automated check will be performed to see whether the combination is correct or not, compared with the combination of the application number and the access code held by OFF database.
34. The field for priority number in application form of second filing would be free-formatted. Due to this, the application format at the OSF does not have to be changed, and the PDX-related system revision could be a minimum.
 35. Yet, it should be noted that if the OSF has the internal system such as the publication editing system which utilizes the priority number filled out at second filing, system revision has to be done in order to eliminate the effect of the access code which is added to the priority number.
 36. Furthermore, priority number is defined in ST.10/C and ST.13 which are WIPO standards for application number, and therefore, there may be the discrepancy between this field for priority number including an access code and these WIPO standards. That is why "**DAS:zxbp**" shown in the sample will be treated as separated information from priority number, but should be interpreted as being presented in the field for priority number for descriptive purpose.

37. Among these proposals, Route D with Biblio Check (Proposal A) can be said to be close to the existing bilateral PDX (except for whether to be checked at the OSF or at the OFF). However, in reality, the bilateral PDX has to depend on manual check in addition to automated check in order to ensure the security, which means the bilateral PDX can only provide incomplete solution in terms of burden reduction in the Office and facilitation of smooth PDX. Therefore, it would be more useful in a practical sense to explore the possibility of Route D with Access Code Check (Proposal B or Proposal B').
38. This is the end of the proposal, showing the essence of DAS improvement, but since further consideration has been made along with it, the results of such consideration will be described in the following sections: in Section 4, the discussion point when Route D with Access Code Check (Proposal B or Proposal B') is adopted, and in Section 5, how it can be linked with the account system which is currently under development by WIPO.
39. Hereafter, "Route D with Access Code Check" will be simply referred to as "Route D".

4. INDIVIDUAL DISCUSSION POINTS IN IMPLEMENTING ROUTE D WITH ACCESS CODE CHECK

(1) The system of issuing access codes

40. When issuing access codes, there can be roughly two possible ways, namely:
- (a) to issue access codes to all the applications filed, or,
 - (b) to invite only those applicants who wish to use DAS and request the issuance of access codes after filing the application.

For example, the USPTO utilizes the former (a) while the JPO adopts the latter (b).

(a) Issue access codes to all applications

41. The former option does not require any requests for the issuance of access codes, which will realize simple procedures for the applicants and also eliminate the need to newly prepare a request for using DAS. Besides, the access codes are made available immediately, which enables applicants to file applications at OSF as soon as they wish to do so, by using the provided access codes. On the other hand, for applicants who will not use DAS, it rises a burden of managing the provided access codes and a risk where application documents may be retrieved improperly if the access code happens to be disclosed.

(b) Issue access codes only for the case when it is requested

42. The latter option (b) has the opposite advantages and disadvantages compared to those of the former (a): access codes will not be provided to those applicants who do not have the intention to use DAS and, consequently, there will be no risk for improper retrieval etc. of the document. Additionally, as it is possible to obtain access codes just before they are used for second filing, the burden for the applicants to manage the access codes for a long time will be reduced. On the other hand, the disadvantages would be the burden for the applicants regarding procedures of requesting for access code issuance, as well as the burden for Offices regarding initial cost to introduce this option (for example, the format change). As another disadvantage of this option, the applicants will be unable to know the access codes in a timely manner when they wish to file an application at the OSF, which will possibly prevent them from filing applications at OSF within priority period. In fact, at the JPO, it takes one week to issue an access code from the request for providing it.

43. Based on the above (a) and (b), the third option is proposed as revision of (a), whereby the access codes are to be provided to all the applications and activation procedure is to be established for enabling the provided codes (call "revised option of (a)"). This revised proposal allows the applicants themselves to have control over the timing to perform the activation procedure, which will reduce the risk of any improper retrievals and any improper use of their access code. In addition, there is another advantage that the access codes have been already issued when they wish to file application at OSF(s). The SB/39, which the USPTO as OFF requires applicants to submit, can be viewed as a type of the activation procedure equivalent to that stated above.
44. It depends on the OFF's decision which option to be adopted, but it is needless to say that it would be desirable for all the offices to adopt the same approach in order to avoid confusion among applicants.

(2) Handling possible leak of access codes

45. The access codes will function as the passwords for OFF to check the validity of each PDRequest. To be specific, in the actual steps the codes are (i) to be written down when claiming for priority at OSF(s), (ii) be sent from OSF to OFF via DAS, and (iii) to be checked by OFF. These steps (i) to (iii) will, in many cases, be performed within one year and four months.
46. If the method of providing access codes as discussed in Section 4(1) above is decided to provide the codes upon request individually in option (b), or provide the codes to all applications and also adopt activation procedures as suggested in Revised option of (a), then the timing of these procedures can be set just before the second filing in order to reduce any possible issues regarding any improper use or unintentional leak of access codes.

(3) Possibility of error

47. In paragraph 12 of the document WIPO/DAS/PD/WG/2/2 (System Architecture) which was for DAS Working Group in second session, it indicates a risk of "incorrect transcription at several stages (applicant to assignee, applicant to OSF, OSF to DAS)". This point was considered as follows.

(3-1) Increase of Data Entry errors at the Offices

48. If the application numbers and access codes that the applicants submit to OSF are to be manually entered at the Offices, then there is the possibility that errors may occur in such processes. However, since no priority document can be sent out from OFF to OSF due to an erroneous entry unless the combination of application number and access code matches as described in 2(2), there is no risk that irrelevant application may be mistakenly sent to the OSF as a priority document. In addition, since re-confirmation can be made using manpower in case where priority documents cannot be retrieved due to some erroneous entry, it is expected that there will not be too many errors of this kind and it will not cause a significant burden for Offices.
49. It should be noted that Priority Document eXchange is based on the relationship of mutual trust between OFF and OSF and illegally access by the Offices is not usually assumed to be occurred. Furthermore, apart from the difference of languages, OSFs basically do not have any motivation to obtain priority documents illegally. Concerning this, even if any Offices except for OSF illegally obtain the application number and an access code primary

unknown by the Offices by some means and attempt to retrieve priority documents from OFF, the history of such retrieval of priority document(s) will be logged in the OFF part of the system. Moreover, as mentioned below, such activities can be monitored by DAS as well. Offices should essentially have no reason to take a risk of retrieving the documents in an unauthorized method, because the mechanism to detect such improper requests exists.

50. Besides, in Route D, essentially, the act of an applicant informing their access code to the OSF can be deemed as the applicant's permission for OSF to access the OFF and also for providing the priority document to OSF.
51. If OFF wishes to realize access control against OSFs under the decision of the applicants, it may be an option for OFF to build a system like access control lists which enables the applicants to make their desired settings of access permission for OSF.

(3–2) Possibility of error by applicants

52. When Route D with Access Code Check is adopted and applicants have to submit access codes in addition to priority number, the possibility to fail retrieval of priority documents from OFF would increase due to some incorrect description made by the applicants themselves.
53. However, as mentioned above, if Route D is adopted and cross-checking system by OFF is implemented, then no error/improper request can occur due to errors made by the applicant. As the result, the same as (3–1), there is no risk that irrelevant application may be mistakenly sent to the OSF as a priority document.
54. Meanwhile, although there is a risk that despite priority claim at the OSF, Priority Document eXchange fails, and the priority document is not sent to the OSF, most Offices have bail-out measures for recovery of the priority right
55. In addition, it deserves consideration to have a transitional phase for a specified period of time immediately after the implementation where, in the event of any wrong access code entry made by the applicant, the system will simply send priority document with a warning to the applicant, so that it may be possible to avoid confusion of applicants. With respect to this point, it will be a matter of choice regarding which should be regarded a more serious issue between the risk of sending a wrong priority document and, the Office workload required for handling the erroneous entry.
56. Additionally, if an applicant obtains an access code that belongs to any third party and files application with priority claims and the access code, the priority document would be sent illegally. However, same as the case for Offices described in (3–1), since the history that indicates illegal procedure on purpose remains, it is low risk to use access codes illegally.

(4) Relief of priority rights in case applicants fail to retrieve priority documents

57. The risk of lapse of priority right stated above in 2 (2) will be further divided into the following two cases in Route D.
 - b–1: a risk that the requested priority document will not be sent due to failure of electronic PDX caused by system trouble or data entry error at the office
 - b–2: a risk that the requested priority document will not be sent due to the applicant's mistakenly providing a wrong access code for OSF

58. The measure for each risk will be described as follows:

Regarding b-1:

59. In the currently operated Route C, after the registration to DAS is completed using access codes and the existence of the relevant OFF document is confirmed, then it is made possible to confirm on the DAS portal site that the registration has been successfully completed. If the registration to DAS has already been completed, OSF sends request for the priority document to OFF and, in response to this request, OFF will send the relevant document to the OSF. If an error occurs during this process and consequently electronic exchange of priority document is not completed, according to Paragraph 13 and 14 in Framework Provisions, it would be possible for the applicant to be relieved if the certificate, issued by DAS, and showing the date when the priority document became available, is provided for the particular OSF.
60. In Route D, however, there is no step for registration to some interim entity as in Route C, hence there is the need to establish some mechanism for providing relief for the applicants. Specifically, since DAS is open to interaction with a large indefinite number of Offices unlike in the bilateral PDX, it is obviously necessary for the OFF side to prepare some means for proving the expressed intention for sending priority documents as a measure to relieve the applicants, without expecting for the OSF side to have their own voluntary measure for such relief. As the means for this, forms SB/39 in the USPTO or activation procedure in "revised option of (a) " could be considered as one of the means stated above. Furthermore, issuance of access codes based on the request of the access (4(1)(b)) is also applicable to this purpose. Thus, it would be necessary to put it into perspective to revise Framework Provisions so that OFF can guarantee the date on which priority documents became available to DAS, and the date by which an applicant in need can be relieved.
61. In addition, it may be possible to give relief to an applicant by using the account system described in detail below in 5(2)(a). That is, an applicant arbitrarily utilizes the below-mentioned account system, registering himself/herself at the system. Then, if WIPO issues a certificate, guaranteeing the date when DAS confirmed the registered application as the date on which priority document became available to DAS, this could be a means to relieve an applicant.

Regarding b-2:

62. Paragraph 14(a) and 15(b) in Framework Provisions state that the office need to notify the applicant before the priority right expires, giving the opportunity to furnish the priority document to it, within a time limit of not less than two months from the date of the notification. In Route D, as it would be possible for an applicant to provide OSF with a correct access code through e.g. written amendment within two months. Thus, in most cases, applicants will be relieved without any particular troubles. It depends on each OSF's decision whether the longer time limit for an applicant to re-furnish the priority document should be given or not. Yet, it would be also possible that access code correction would be admitted even after the priority right period is expired at the OSF's own discretion.
63. As shown above, when adopting Route D, in either risk case (b-1 or b-2), it would be possible to provide some sort of relief measure for applicants. Thus, considering all these aspects, re-consideration on Framework Provisions would be needed in the future,

5. LINKAGE WITH THE ACCOUNT SYSTEM

64. In the Paragraph 11 in the above-mentioned WIPO/DAS/PD/WG/2/2 (System Architecture) prepared for the 2nd DAS WG meeting, the following description is found:

“11. Possible future developments might include an “account” system, where an applicant who files many applications will be able to set a “default” access list, but this would not be part of the system to begin with in order to minimize costs and the time needed to deploy a basic working system.”

65. The DAS account system described above is assumed to enable applicants to refer applications or make settings of applications at once, by linking applications with user based account. Such DAS account system is considered to be highly compatible with the PCT secure online services which is now under development and where File Inspection and other capabilities are equipped.

66. Regarding the linkage of DAS Route D to the DAS account system, the following are provided as the outcome of the review.

(1) Business cases

67. In Route D, WIPO DAS will still serve as a relaying point for all the priority documents exchange among Offices using DAS. Therefore, once the applicants have their applications registered to the account system, then the applicants can trace the exchanges of their priority documents for all the applications they have filed. This enables to check whether their applications have been sent correctly to the OSF as the requested priority documents and, check if there has been any improper request/retrieval thereby.

68. Meanwhile, applicants do not need to set which Offices are permitted access to the document on an access control list.

(2) Registration method

69. In the account system, there will be an issue who will link applicant and application by using what kind of information.

70. Concerning this, two possible methods can be proposed.

(a) Registration for the account system by the applicants themselves

71. In case the registration is to be done by applicants themselves, it is not enough to use application number for linking the application number with the applicants, where there is a risk of having some other party's application wrongly associated with the applicant's own account. Therefore, one option to be considered is to establish the processes for DAS to validate (as in Route C) if the application registered to OFF is correct by also registering the access codes along with the application numbers. The access code is same as the code that is submitted at OSF and also used as key information to link applications with applicants. Such mechanism will be used by the applicants on their own responsibilities when they wish to ensure traceability. However, since this means providing the access codes to places other than the relevant OSF and OFF for other purpose than checks to be performed by OFF, it is necessary to ensure sufficient level of security so that there will be no leak of such access codes. For example, one possible measure would be not to store the access codes in the system after DAS completes its verification process to OFF.

(b) *Registration to the applicants' account by OFFs*

72. Another option is for OFF to register the application to DAS on behalf of the applicants upon request from the applicants. In this case as well, it is reasonable to use the code (Account ID) representing the applicants as provided in the account system for associating the applicants to the applications. So if the applicant desire to use account system, they submit Account ID to the OFF. In this method, there is no need for the applicants to have the access code in consideration for the sake of the account system, which reduces the burden for the applicants; however the OFF should be responsible for the association, which will increase the burden for checking the association at OFF side.

6. SUMMARY

73. As an alternative to the existing DAS, Route D, which is easy to understand for an applicant compared to the current DAS route, especially integration into the proposal of providing the OSF with an access code issued by the OFF (Route D with Access Code Check) would be a promising candidate. As mentioned above, it is hard to say that the concerns about introduction of Route D can be critical. In addition to such simple procedure, it is also feasible to integrate the account system in order to ensure traceability, which is worth considering as long as applicants' needs are recognised.

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