

## **Patent Cooperation Treaty (PCT) Working Group**

**Twelfth Session  
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### **PROGRESS REPORT: PILOT ON NETTING OF PCT FEES**

*Document prepared by the International Bureau*

#### **SUMMARY**

1. This document sets out a progress report on the pilot on netting of certain PCT fees, a project to analyze the possibility of introducing a “netting structure” for all PCT fee transactions. The principal aim of the netting structure is to reduce exposure to movements in currency exchange rates of fee income for the International Bureau. Additional goals include improving cash management, reducing cost and effort, and simplifying procedures for receiving Offices (ROs), International Searching Authorities (ISAs), International Preliminary Examination Authorities (IPEAs) and the International Bureau in handling PCT fees. The pilot project for netting of PCT fees began in 2018 with a number of ROs and ISAs, mainly covering search fees and international filing fees.
2. An evaluation of the results to date indicates that the pilot project has delivered positive results (see Annexes I and II). The International Bureau therefore intends to extend the netting structure to further interested ROs and ISAs. The International Bureau has also submitted proposals to the PCT Working Group (see document PCT/WG/12/20) aimed at formalizing the arrangements through amendments to the PCT Regulations and modifications of the Administrative Instructions.
3. Furthermore, the International Bureau intends to invite several Offices that act as a PCT receiving Office and/or International Authority and also as an Office of a Contracting Party to the Madrid and/or the Hague Systems to join an expanded netting process, which would include all transfers of funds to and from WIPO. This arrangement would be introduced only for Offices whose financial regulations and accounting rules so permitted.

## **BACKGROUND**

4. The PCT Working Group, at its ninth session in May 2016, discussed a document prepared by the International Bureau that set out various possible measures to reduce the risk of exposure of PCT fee income to movements in currency exchange rates (document PCT/WG/9/9 and paragraphs 21 to 36 of document PCT/WG/9/27).

5. The International Bureau subsequently developed a pilot “netting structure” for the transfer of PCT fees, outlined at the tenth session of the PCT Working Group (see document PCT/WG/10/6 and paragraphs 19 to 21 of document PCT/WG/10/24). Progress was reported to the eleventh session of the PCT Working Group (see document PCT/WG/11/4 and paragraphs 46 to 51 of document PCT/WG/11/26), where the Chair summarized that there was strong support from delegations for the netting pilot and for more Offices to join the pilot, but some reservations about expanding netting to cover fees from other global IP systems at WIPO such as the Madrid and Hague Systems.

6. An evaluation of the results of the netting pilot in 2018 was conducted in March and April 2019, consisting of a survey of ROs and ISAs participating in the netting pilot (see results in Annex I) and an analysis of the financial impact prepared by WIPO’s Internal Oversight Division, Internal Audit Section (see Executive Summary attached as Annex II). A copy of the complete report has been made available by the Internal Audit Section on its website at <https://www.wipo.int/about-wipo/en/oversight/iaod/audit/>.

7. Owing to the origins of the project, the pilot has so far referred to “netting” as covering all transfers of fees via the International Bureau, whether or not any particular transfer was the result of offsetting one amount against another. This document continues to use that terminology, but more specific terminology is being developed for the future (see document PCT/WG/12/20) to avoid the impression that Offices are required to accept netting of fees collected against fees due in order to participate in the arrangements.

## **INTRODUCING A PROCESS FOR THE TRANSFER OF FEES**

### **SCOPE OF PROCESS**

8. Building on arrangements which had been successfully implemented between the United States Patent and Trademark Office (USPTO) as RO and the European Patent Office (EPO) as ISA for the transfer of search fees from the RO to the ISA through the International Bureau, the International Bureau, at the beginning of 2018, introduced a pilot project for the netting of PCT fees. This pilot significantly expanded the number of Offices participating, the fee types involved and the provisions for balancing payments in both directions.

9. At present, the pilot provides for the netting of the following fees and amounts:

(a) PCT fees collected by Offices in their roles as RO or IPEA for the benefit of the International Bureau or other Offices:

(i) international filing fees collected by the Office as an RO;

(ii) search fees collected by the Office as an RO for transfer to other Offices as ISAs;

(iii) handling fees collected by the Office as an IPEA;

(b) PCT fees received by the International Bureau (IB) for the benefit of International Searching Authorities:

(i) search fees collected by the IB in its capacity as an RO on behalf of ISAs participating in the pilot;

(ii) supplementary search fees collected by the IB for transfer to an Authority specified for supplementary search (SISA) participating in the pilot; and

(c) amounts owed by the IB to the ISA or owed by the ISA to the IB under Rule 16.1(e) arising from any exchange gains or losses incurred by the Office as an ISA due to search fees transferred to the ISA by ROs not participating in the pilot in currencies (other than the currency in which the ISA has fixed its search fee) that are freely convertible into the fixed currency.

10. The process does not apply to fees collected by ROs for the benefit of the same Office in its role as ISA.

11. The pilot is also envisaged to be extended to payments relating to other WIPO services, such as the Madrid and Hague Systems, for Offices where this is relevant and desirable. This is expected to begin in the near future.

12. Software to manage the netting process, at an annual cost of 69,000 Swiss francs and with a one-time implementation fee of 5,000 Swiss francs, has been fully operational since the beginning of 2018.

#### DEFINITION OF PROCESS

13. Participation in the pilot by ISAs is covered in a Memorandum of Understanding (MoU) or through an exchange of letters, defining the netting procedure and the search fee transfer process, as well as relevant documentation requirements for that ISA.

14. In accordance with the terms of the MoU or the exchange of letters, the IB invites each of the ROs that has specified the participating ISA as competent for the international search of applications filed with the RO to participate in the pilot. In each case:

(a) the IB acts as the “agent” of the participating ISA by collecting the search fees on behalf of the ISA and reviewing the documentation submitted by the participating RO;

(b) the IB agrees a timetable with each participating RO with regard to the date each month on which the RO must transfer the search fees to the IB in order for those fees then to be transferred to the participating ISA concerned, and also agrees the currency for the transfer of the search fees;

(c) transactions not received by the agreed date are held by the IB and transferred to the participating ISA in the following month.

15. Each RO invited to participate currently has the option either to agree to participate or to indicate that it prefers to continue dealing directly with the ISA. However, by providing an option to an RO not to participate, ISAs participating in the pilot are forced to operate two different procedures for the receipt of international searching fees, reducing the benefits that have been achieved to date related to improved cash management, reduced banking charges and simplification of procedures. This appears to be necessary for the short term, but document PCT/WG/12/20 presents proposals for amendment of the PCT Regulations aimed at eliminating the barriers and encouraging participation, with a view to eventually providing a single route for all transfers of fees.

16. In addition, to enable ROs and ISAs whose accounting systems or financial rules provide constraints to the use of netting (offsetting one fee type against another fee type), increased flexibility has been introduced to the pilot, including:

- (a) allowing transfer of search fees by the IB to an ISA without netting the search fees against other PCT fees, should such netting not be permitted by the ISA's accounting rules or financial regulations;
- (b) enabling Offices to continue to submit lists of PCT filing, IPEA handling and international search fees to the IB in the same format as the RO used prior to participation in the pilot;
- (c) a degree of flexibility with regard to the format in which lists of search fees are delivered to ISAs, reducing the need for immediate IT changes and training;
- (d) enabling Offices to submit to the IB or receive from the IB separate payments for different fee types, or fees collected by or for different Offices (for example, if the IB collected search fees on its behalf from several ROs, separate payments could be sent to the ISA for each RO, should this be required by the ISA's accounting rules or financial regulations); while this reduces some of the benefits of merging transfers into single payments, it may enable certain Offices that would like to join to be able to participate; and
- (e) for Offices utilizing ePCT, introducing new procedures that will eliminate the requirement that the RO submit listings of PCT international filing fees and search fees, as well as IPEAs submitting listings of handling fees; changes to the ePCT system are in progress that will enable participating ROs to generate the required information on fees transfers directly from ePCT.

17. The introduction of the flexibilities listed in items (a) to (d) of paragraph 16, above, reduces somewhat the benefits that had been anticipated for the pilot. However, the flexible approach has enabled some ROs and ISAs to join the pilot without necessitating changes to their IT systems and limiting the changes to internal procedures which would have required training, allowing the potential benefits to be evaluated effectively across a sufficient range of Offices.

## **UPDATE ON PARTICIPATION OF INTERNATIONAL SEARCHING AUTHORITIES AND RECEIVING OFFICES**

### **ISAS PARTICIPATING IN THE PILOT**

18. In 2018, the EPO, the Japan Patent Office (JPO) and the Austrian Patent Office joined the netting pilot as both ISAs and ROs.

19. The netting pilot with the EPO became operational for transactions occurring beginning January 1, 2018 (netting month February 2018). Due to the large number of ROs that specify the EPO as a competent ISA, the EPO pilot has been implemented in a phased approach, which it is planned to extend through to 2020. The pilot now includes 33 ROs that have specified the EPO as competent, including ROs that collect the search fees in euros and ones collecting them in other currencies. It has incorporated the ongoing arrangement between the USPTO as RO, the EPO as ISA and the IB, referred to in paragraph 8, above, which has been extended until 2021.

20. A pilot with the JPO as ISA became operational on April 1, 2018 (netting month May 2018). The pilot now includes three ROs that have specified the JPO as competent. Invitations to some other ROs which have specified the JPO as competent are in process and all remaining ROs will be invited in 2019.

21. A pilot with the Austrian Patent Office as ISA became operational on August 1, 2018 (netting month September 2018), and now includes two ROs that have specified the Austrian Patent Office as competent. Invitations to some additional ROs are now in process and all remaining ROs will be invited in 2019.

#### STATUS OF DISCUSSIONS ON PARTICIPATION OF OTHER ISAS

22. The IB is currently holding discussions with the Korean Intellectual Property Office (KIPO) on its possible participation in the pilot as an ISA. As the Korean won (KRW) is not considered to be a convertible currency, the IB has made arrangements with its banks to acquire sufficient KRW at a favorable exchange rate as soon as a pilot begins. This approach should significantly reduce the exchange rate risk to the IB under Rule 16.1(e). It should also reduce the work effort required by KIPO to prepare a claim for losses or gains due to exchange rates and the work effort of the IB to review and process the claim.

23. Furthermore, the IB is working on arrangements to expand the pilot to include the USPTO, the China National Intellectual Property Administration (CNIPA) and the Russian Federal Service for Intellectual Property (ROSPATENT) as ISAs. These arrangements will take into consideration the particular requirements of these Offices, both as ISAs and as ROs, along with currency restrictions and the type of international fees administered by each Office.

24. Proposals have been submitted to the Swedish Patent and Registration Office and the Intellectual Property Office of the Philippines, which are under consideration by those Offices, and invitations will be extended to other ISAs that have expressed an interest in the pilot in 2019.

#### PARTICIPATION OF RECEIVING OFFICES

25. By the end of April 2019, 34 ROs specifying one or more of the three participating ISAs as competent had joined the netting pilot. Several ROs that were invited to participate in the netting pilot during 2018 and 2019 to date have indicated that they are unable to participate due to internal regulations requiring that payment be made directly to the competent ISA. It is hoped that this issue can be addressed through the amendments to the PCT Regulations and modifications to the Administrative Instructions proposed in document PCT/WG/12/20.

#### BENEFITS REALIZED TO DATE

26. A formal evaluation of the impact of the netting pilot was conducted in March and April 2019. The evaluation consisted of a survey of participating ISAs and ROs, the results of which are set out in Annex I, and a review of the financial results conducted by WIPO's Internal Oversight Division, Internal Audit Section (see Executive Summary in Annex II). The evaluation confirmed four areas of mutual benefit to participating ISAs and the IB, as follows:

- (a) The claims for reimbursement of foreign exchange gains and losses under Rule 16.1(e) from participating ISAs have been reduced to negligible amounts. Through its centralized currency management, the IB has been able to take advantage of the competitive exchange rates offered by banks for converting larger tranches of currency. The reduction in claims for reimbursement has impacted positively on the workload of the participating ISAs and also on the IB. Only when all of the ROs that have specified a participating ISA as competent have joined the pilot will the Rule 16.1(e) claim preparation workload and the relevant part of the foreign exchange risk be completely eliminated for the ISA and the IB.

- (b) Verification by the IB of the amount of fee paid and the status of the application has simplified the work effort of participating ISAs without, to date, having a major impact on the workload of the IB. However, the fact that not all ROs that have specified the participating ISAs have to date joined the netting pilot requires each ISA to maintain two procedures for handling the inflow of international search fees, thus reducing the overall gain.
- (c) The netting of the search fees due to each ISA against international filing fees and handling fees has had a positive impact on cash management, particularly important in this period of negative interest rates for Swiss francs and euros. By grouping these fees into a consolidated single payment, participating ISAs account for only one monthly receipt or payment to or from the IB, the elements of which are detailed in a netting statement available for confirmation by the ISA prior to the settlement date.
- (d) The bank charges that would have been incurred using multiple transfers have been eliminated. However, in absolute terms, the net savings were not significant.
- (e) ROs now have the option of submitting one payment, combining search fees due to participating ISAs with international filing fees due to the IB, thus reducing payments and bank transfer charges.

#### **ANCILLARY ISSUES TO BE ADDRESSED**

27. Running the pilot has required additional time for staff at the IB to check and resolve issues in the monthly netting exercise. It has been necessary to train the staff and to ensure that the pilot is run in a manner which allows a determination of whether the estimate that the benefits will outweigh the costs is correct. Particular attention is being given to the number and type of errors which occur and identifying ways in which these can be reduced or eliminated.
28. The efficient running of the pilot assumes that all participating ROs are able to deliver their application information and payment of fees to the IB accurately and timely in a supported data format, including all the information required by the netting software and its related processes. This will require participating ROs to cooperate with IT changes (usually relatively minor) and staff training. At present, ROs are able to continue to submit their payments and application information to the IB in the same format as had been sent to each participating ISA. However, the goal is for information to be submitted in a consistent XML format. Efforts to achieve this through the introduction of additional IT tools and through the use of ePCT are in progress.
29. Offices which have separate accounting systems and bank accounts for different purposes (for example, for patents and for trademarks) will need to consider whether procedures can be revised to allow net payments across the two systems to be paid to or from just one of those accounts. To date, several ISAs invited to participate have declined, due to limitations related to their IT systems or to budgetary or accounting restrictions related to the netting of transactions related to different revenue streams.
30. The procedures will have consequential effects on accounting procedures for the PCT, Madrid and Hague Systems, which are in the process of being analyzed.
31. A variety of issues were examined in 2018, including optimizing the system for the key deliverable of minimizing the risks of exchange rate fluctuations. This has resulted in opening new bank accounts for the receipt of currencies for which WIPO currently has limited outgoings and arranging for the sale of these currencies to acquire currencies against which to net transactions. Previously, the IB received PCT international filing fees in these currencies from the ROs into a Swiss franc account, which were thus not converted at competitive exchange

rates. By receiving international filing fees and search fees in accounts based on each currency and then converting the unused balance to a currency needed to meet outgoing requirements, cash management has been enhanced and better exchange rates have been achieved.

32. It should be noted that the process in the pilot is not designed to completely eliminate the exchange risk related to the PCT. Netting addresses the exchange differences related to the Rule 16.1(e) requirement for the IB to reimburse ISAs for differences related to their receipt of fees transferred by ROs in a prescribed currency and the amount of the ISA's fixed fee. Netting also addresses cash management issues related to the inflow of filing fees in currencies other than the IB's functional currency (Swiss franc/CHF). In the past, the value of claims for Rule 16.1(e) reimbursement has been significant. These claims have been reduced to nominal amounts for ISAs and ROs participating in the pilot.

33. The broader issue of exchange risk created by the use of the equivalent amounts of certain fees, as approved by the PCT Assembly (see document PCT/A/40/2), is not addressed by the pilot. The mechanism, which was adopted by the PCT Assembly in 2009 and brought into force from July 1, 2010, has functioned as planned and enabled applicants to make payment of certain PCT fees which have been established in Swiss francs (CHF) by the PCT Assembly, in currencies that are prescribed by PCT receiving Offices, using CHF equivalent amounts set by the IB. The pilot does not address the exchange risk that results when major currencies shift in value up or down against the Swiss franc, creating significant differences between the equivalent amount set by the IB and the Swiss franc value of the PCT fees used in revenue forecasting. These differences are currently addressed through the revenue estimating procedures used in the preparation of WIPO's budget.

*34. The Meeting is invited to note the contents of the present document.*

[Annexes follow]

## SUMMARY OF SURVEY

1. A questionnaire was sent out to Offices seeking feedback on their participation in, or reasons for not participating in the pilot. Twenty-one Offices responded to the questionnaire, including 18 responses from Offices participating as receiving Offices (RO), three from Offices participating as International Searching Authorities (ISA) and three from Offices not currently participating. This Annex summarizes the responses and includes feedback from the International Bureau on what is being done to address some of the issues raised.
2. All responses from participating Offices in both roles (as RO and ISA) indicated that the Offices were satisfied or very satisfied with their participation in the pilot. Several Offices expressed the hope that the pilot could be extended to a wider range of Offices in the near future.
3. Most Offices indicated that the ongoing effort and costs involved were either the same or slightly less than under the previous arrangements. For Offices interacting with several other Offices – and especially the European Patent Office, which acts as ISA for over 100 ROs – the reductions in effort had been considerable. One Office reported that the transfer fees were higher than those previously paid, but by an amount so small as not to be of concern.
4. One Office noted that some initial effort had been required to adjust to the new arrangements, but that the opportunity had been taken to improve internal processes, resulting in a significant simplification of procedures.
5. Two Offices observed that the payment deadlines were sometimes short, but that the International Bureau had been able to show further flexibility in cases where this was a real problem. The process for establishing the calendar will seek to maximize the time available to Offices to make the required checks and arrangements for payments.
6. The main wishes for improvement expressed by Offices were:
  - (a) more training in the new arrangements, including ePCT services, the Coprocess software and aspects and understanding of the timetable (the International Bureau will review the documentation and options for delivering any required training to Office users);
  - (b) to allow the required information to be provided in Excel format (as indicated in main body of this document, the procedures have been changed to allow submission in the Excel format);
  - (c) to establish a clear, common legal basis for the transfer arrangements (this is being addressed in document PCT/WG/12/20);
  - (d) to receive lists earlier, leaving more time for transfers to be arranged, and to consider timing of delivery of statements having regard to Offices in different time zones (the 2020 calendar will adjust and accommodate these requirements);
  - (e) to allow payments through a WIPO Current Account (this option is available to participants and is encouraged by the International Bureau where practical; it will be considered on a case-by-case basis, as it relates to agreement between Offices and the International Bureau on currency exchange rates).

[Annex II follows]



EXECUTIVE SUMMARY OF  
ANALYSIS OF THE FINANCIAL IMPACT

*The following is the Executive Summary of an analysis of the financial impact of the pilot, conducted by the World Intellectual Property Organization's Internal Oversight Division. The full report is available at <https://www.wipo.int/about-wipo/en/oversight/iaod/audit/>.*

**EXECUTIVE SUMMARY**

1. "Netting" is a settlement mechanism used to allow a positive value (payment) and a negative value (receivable) to offset and partially or entirely cancel each other out. The netting process consolidates all transactions between participants and calculates settlement between the participants on a "net" basis, typically by means of a single payment or receipt.
2. In 2018, the International Bureau (IB) launched the Patent Cooperation Treaty (PCT) Netting Pilot following a positive response to the invitations sent to Receiving Offices (ROs) and International Searching Authorities (ISAs) to participate in the Pilot. The European Patent Office (EPO), Japan Patent Office (JPO) and Austrian Patent Office (ATPO) responded positively to the invitation.
3. The table below shows the status of ROs/ISAs invited to participate in the PCT Netting Pilot as of February 2019.

Receiving Offices (ROs) Participating in Netting	Declined	No Response to invitation	Inactive <sup>1</sup>	Invitation in Progress	Total ROs specifying participating ISAs
43	14	26	43	22	148

Source: Finance Division

4. The table below shows the total amounts involved in the netting process between February 2018 and January 2019, for each participating ISA and in respective currencies.

International Searching Authority (ISA)	Amounts to be paid by ISAs to the IB	Amounts to be paid by the IB to the ISA	Net Position
EPO (Euro)	44,848,447	-62,142,042	-17,293,595
ATPO (Euro)	496,636	-48,744	447,892
JPO (JPY)	5,355,199,449	-23,845,752	5,331,353,697

Source: Finance Division

5. For that period, the IB was a net payer of 17.3 million Euros (approximately 19.5 million Swiss francs) to the EPO, while the IB's was a net receiver of 5.3 billion Japanese Yen (approximately 47 million Swiss francs) from the JPO.

<sup>1</sup> ROs, which did not submit any international applications to any of the three participating ISAs for search in 2017 or 2018.

6. The netting statistics show that, during 2018, ROs submitted 62,917<sup>2</sup> international applications to ISAs for search. The three ISAs (EPO, JPO, and ATPO) currently participating in the PCT Netting Pilot handled 44,882 (71.34 per cent) of these applications, whereas the remaining 18,035 applications (28.66 per cent) were handled by ISAs/ROs not participating in the Pilot.
7. In respect of the 44,882 applications, the three ISAs together handled related search fees for 43,398 applications (68.98 per cent of the 62,917 applications) from ROs that participated in the PCT Netting Pilot. The search fees for the remaining 1,484 (2.36 per cent) applications were directly remitted to the ISAs by ROs that were not participating in the Pilot.
8. The PCT Netting Pilot aims to reduce exposure of PCT fee income to movements in Foreign exchange (FX) resulting from search fee flows, which culminate in 16.1(e) claims, improve cash management for the IB, ROs and ISAs, reduce banking charges, and improve the efficiency and effectiveness of the PCT process through simplification of procedures.
9. However, the PCT Netting Pilot's impact on reducing exposure of PCT fee income to movements in currency exchange rates addresses only the differences between the UN exchange rate used by the IB to recognize income in its accounts and the FX spot rate on the date of the receipt and/or disbursement of funds. It does not address the FX impact of the Equivalent Amount<sup>3</sup> mechanism established by the PCT Assembly.
10. The Internal Oversight Division (IOD) found that the netting process has fundamentally changed the workflows of the IB and the participating ROs/ISAs in respect of PCT search fees. The workflow for handling PCT search fees has been streamlined, with the IB experiencing an evident reduction in the workload relating to claims of foreign exchange losses and gains that arise as per PCT Rule 16.1(e)<sup>4</sup>. Going forward, the process would be further streamlined and more efficient by automating a number of manual tasks undertaken in netting operations.
11. Implementing the netting process resulted in the average notional amount of cash at the bank (Euro currency) for PCT search fees dropping by 69 per cent. This reduction enabled the IB to avoid finance costs related to the prevailing negative interest rates.
12. In addition, IOD noted a nominal monetary decrease in the bank charges related to Electronic File Transfer (EFT) charges, which correlated with the reduction in the volume of EFT transactions – payments and receipts, and with the reduction in the number of claims for reimbursements, from the participating ISAs.

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<sup>2</sup> Represents international applications where the ISA is not the same Office that acted as an RO; in other words, the figure excludes international search applications submitted to the ISA through its own national RO.

<sup>3</sup> According to PCT Rules, the IB determines an equivalent amount per fee for each freely convertible currency in accordance with the directives of the PCT Assembly. When the exchange rate difference between one or more currencies against the Swiss franc fluctuates above or below five per cent for four consecutive Fridays; the Director General must establish a new equivalent amount for these currencies, which should then be communicated to the ROs and the ISAs.

<sup>4</sup> Where in respect of the payment of the search fee in a currency prescribed by the RO ("the prescribed currency"), other than the currency fixed by the ISA ("the fixed currency"), the amount actually received under paragraph (d)(i) of this Rule by the ISA in the prescribed currency is, when converted by it into the fixed currency, less than that fixed by it, the difference will be paid to the ISA by the IB, whereas, if the amount actually received is more, the difference will belong to the IB.

13. The volume of EFT transactions decreased from 90 in 2017 to 39 in 2018 (netting period), which is a decrease of 51 transactions (57 per cent decrease), while the number of claims for reimbursements decreased from 160 (pre-netting period) to 87 (netting period), a decrease of 73 claims (46 per cent decrease). This helped in mitigating other operational risks, such as potential errors due to reduced processing of a large volume of transactions.

14. Leveraging on the setup available in Coprocess (the netting software) and encouraging participation from the current list of non-participating ISAs/ROs, will widen the view of currency exposures, reduce the number of claims for reimbursements under PCT Rule 16.1(e), provide greater predictability to the budgetary process, and enhance financial stability of the IB.

15. Further, the IB should review the resources required for the netting process, considering current resources and structure, future automation and potential increase in the number of netting participants.

16. Finally, the IB would benefit from proposing an amendment of the PCT Regulations and related Administrative Instructions to, *inter alia*, reflect and align with current netting procedures and work practices.

[End of Annex II and of document]