SUMMARY OF SURVEY RESPONSES ON WIPO STANDARD ST.92 IMPLEMENTATION PLAN

*Document prepared by the Secretariat*

1. Please enter the two-letter code of the member state or inter-governmental organization you represent, which is defined in WIPO Standard ST.3.

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| **ST.3 Code** | **Country or Office** |
| AU | Australia, IP Australia |
| BG | Bulgaria, Patent Office of the Republic of Bulgaria |
| BR | Brazil, National Institute of Industrial Property (INPI) |
| CA | Canada, Canadian Intellectual Property Office (CIPO) |
| CH | Switzerland, Swiss Federal Institute of Intellectual Property (IPI) |
| CN | China, China National Intellectual Property Administration (CNIPA) |
| DE | Germany, German Patent and Trade Mark Office (DPMA) |
| DO | Dominican Republic, National Office of Industrial Property (ONAPI) |
| EA | Eurasian Patent Organization (EAPO) |
| EM | European Union Intellectual Property Office (EUIPO) |
| EP | European Patent Organization (EPO) |
| ES | Spain, Spanish Patent and Trademark Office (OEPM) |
| FI | Finland, Finnish Patent and Registration Office (PRH) |
| GB | United Kingdom, The United Kingdom Intellectual Property Office (UK IPO) |
| GE | Georgia, National Intellectual Property Center of Georgia (LEPL) |
| HN | Honduras, Institute of Intellectual Property (DIGEPIH) |
| HR | Croatia, State Intellectual Property Office of the Republic of Croatia (SIPO) |
| IL | Israel, Israel Patent Office (ILPO) |
| IS | Iceland, Icelandic Intellectual Property Office (ISIPO) |
| JO | Jordan, Department of the National Library |
| JP | Japan, Japan Patent Office (JPO) |
| KE | Kenya, Kenya Industrial Property Institute (KIPI) |
| KG | Kyrgyzstan, State Agency of Intellectual Property and Innovation (Kyrgyzpatent) |
| KR | Republic of Korea, Ministry of Intellectual Property (MOIP) - the former Korean Intellectual Property Office (KIPO) |
| LT | Lithuania, State Patent Office of the Republic of Lithuania |
| MC | Monaco, Monaco Industrial Property Office (MCIPO) |
| MX | Mexico, Instituto Mexicano de la Propiedad Industrial (IMPI) |
| NO | Norway, Norwegian Industrial Property Office (NIPO) |
| PE | Peru, National Institute for the Defense of Competition and Intellectual Property (INDECOPI) |
| PL | Poland, Patent Office of the Republic of Poland |
| SE | Sweden, Swedish Intellectual Property Office (PRV) |
| SG | Singapore, Intellectual Property Office of Singapore (IPOS) |
| SV | El Salvador, Salvadoran Institute of Intellectual Property - National Registry Center (CNR) |
| TR | Türkiye, Turkish Patent and Trademark Office (TURKPATENT) |
| TT | Trinidad and Tobago, Trinidad and Tobago Intellectual Property Office |
| TZ | United Republic of Tanzania, Business Registrations and Licensing Agency (BRELA) |
| US | United States of America, US Patent and Trademark Office (USPTO) |

1. Does your Office or Organization already have a transition plan for exchanging patent priority documents in WIPO Standard ST.92 format?

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| **Response** | **ST.3 Code** | **Total** |
| Yes | BR, CN, EA, ES, GE, IL, JO, JP, KR, NO and TR. | 11 |
| No | AU, BG, CA, CH, DE, DO, EM, EP, FI, GB, HN, HR, IS, KE, KG, LT, MC, MX, PE, PL, SE, SG, SV, TT, TZ and US. | 26 |

* 1. Please provide details of the plan and the expected date by which WIPO Standard ST.92 will be implemented.

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| **ST.3 Code** | **Response** |
| BR | According to paragraph 14 of WIPO/DAS/PD/WG/4/3 and considering Brazil is a user of the WIPO DAS Portal, we plan to use the service which is being developed by WIPO to compose a PDDP by combining PDF and ST.26 files. In our understanding, and since INPI BR would upload PDFs and XMLs manually to the WIPO DAS portal, there would be nothing to develop from our end. Therefore, the expected date depends on the training to be provided by WIPO. The review of standard operating procedures to manage the change from PDF/ST.26 to PDDP is expected to be straightforward after the training. |
| CN | CNIPA has started applying the WIPO Standard ST.92-related project. If the project is approved, CNIPA will begin the IT development in 2026. However, if the project is denied, the WIPO ST.92 implement plan will be delayed. |
| EA | The technical implementation is planned for 2026 (by 31/12/2026). |
| ES | The project to exchange priority documents in accordance with WIPO Standard ST.92 is planned to begin in September 2026. It is expected to be completed in September 2027. |
| GE | According to Article 22, paragraphs 3 and 4 of the "Instruction on Procedures Related to Drafting and Filing Applications for Inventions and Utility Models and Granting a Patent," approved by Order №1 of the Chairman of the Legal Entity of Public Law – National Intellectual Property Center of Georgia (Sakpatenti) on January 12, 2024, it is permissible to submit priority documents either in hard copy or electronically via the WIPO Digital Access Service (DAS) system. At Sakpatenti, the WIPO DAS system is currently used for the online exchange of priority documents. Therefore, the implementation of WIPO Standard ST.92 at Sakpatenti will be aligned with the timeline of DAS supporting the submission and exchange of documents in ST.92format. |
| IL | The ILPO is already a Participating Office in WIPO DAS , acting as a Depositing Office as well as an Accessing Office for patent as well as industrial design priority documents. The ILPO is expected to complete the preparations for the implementation of WIPO Standard ST.92 by the end of 2026. |
| JO | Our organization has developed an initial transition plan to adopt WIPO Standard ST.92 for exchanging patent priority documents. The plan includes the upgrade of current IT infrastructure, staff training on XML-based formats, and integration with internal document management systems. The expected date for full implementation is Q2 of 2026, depending on the availability of necessary resources and technical support. |
| JP | The planned implementation date for WIPO Standard ST.92 at JPO is scheduled for January 2028 at the earliest. However, the schedule may change depending on the timing of the formulation of the new standard for designs. |
| KR | MOIP is currently preparing a development project for the exchange of priority documents in a packaged (zip) format and is working on securing the budget for next year. From the system development perspective, MOIP is making every effort to implement it by July 2027 as requested by the International Bureau. |
| NO | The project is to be initiated in September 2025. First by usage of API, then by transition to PDDP. The detailed plan is to be decided within September. |
| TR | As part of our digital transformation efforts, our Office has started developing new systems and applications. The transition to exchanging patent priority documents in WIPO Standard ST.92 format will be incorporated into our planning, and we aim to complete the implementation by the end of 2027. |

* 1. Have those plans been reviewed by your legal department and, if so, please share any feedback that was provided.

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| **ST.3 Code** | **Response** |
| BR | No, this is a technical decision. |
| CN | Yes. No legal barrier. |
| EA | The consultations are in progress; no challenges are currently expected in the legal area. |
| ES | Yes, there are questions and comments on how to harmonize WIPO Standard ST.92 and European Patent Office initiatives concerning the transmission of priority documents. |
| GE | It has been reviewed by the Legal Department and is approved. |
| IL | No |
| JO | Yes, the plan has been reviewed by the legal department, and the feedback confirmed the plan's compliance with national legal requirements and data protection regulations. |
| JP | We have confirmed with the legal department that there are no legal concerns regarding the provision of priority documents submitted by the providing Office being packaged by WIPO DAS, as well as the acceptance of PDFs extracted from a ZIP folder by WIPO DAS as the receiving office. |
| KR | Currently, this matter requires further review for possible legislative amendments. |
| NO | The transition format rendition and procedure is acceptable under current requirements. |
| TR | Since a detailed implementation plan has not yet been finalized, our legal department has not reviewed the plan at this stage. |

* 1. Please provide the reasons or challenges that are preventing your Office or Organization from developing such a plan.

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| **ST.3 Code** | **Response** |
| AU | IP Australia is currently developing the business case for the transition in consultation with relevant teams and business groups. The challenges to date include competing priorities and resource constraints. |
| BG | Due to the complex nature of the processes and limited human resources developing a transition plan will require more time. |
| CA | We have initiated a project to adopt the use of WIPO's ePCT rather than our current aged C system named "Interapp". It may be possible -that if timing works out, then for Patents we will be using the capabilities of ePCT for the Priority Documents. If for some reason our ePCT project is delayed, then we will need to implement ST.92 within our C "Interapp" system. |
| CH | Lack of resources. |
| DE | DPMA already participates in WIPO DAS as a depositing office using the API interface. In addition, preparations are ongoing to enable the DPMA to participate in WIPO DAS as an accessing office. With the technical implementation of the participation of the DPMA as an accessing office, we are also planning to introduce the St.92 standard. As we already use the API interface, we expect the implementation effort to be medium. |
| DO | When implementing a plan of this scale, it is necessary to have digitized patent documents. This is our focus. |
| EM | Current sunset date is only for patents. |
| EP | The EPO has developed the new electronic certified copies service while the ST92 standard was not fully approved. Nevertheless, most of the specifications of the draft ST.92 standard have been implemented. A full alignment with ST92 is expected in the coming years. The EPO is currently planning the activities, including the use of the new DAS API and the modernization of the DAS internal system. |
| FI | Due to resource constraints, we have not yet drafted a formal implementation plan. However, we believe that the planning process can be completed according to the proposed timeline. However, we have assessed the requirements set by WIPO Standard ST.92 and the level of automation needed within our office. A detailed specification phase has not yet been carried out. We currently plan to begin producing ST.92-compliant PDDP files at the beginning of 2027. The reception of priority documents is handled manually; therefore, from a technical standpoint, we are already capable of receiving PDDP files. Our legal team has conducted a preliminary review of WIPO Standard ST.92 and has not identified any obstacles to its implementation. |
| GB | We are currently working towards the implementation of the DAS API to send/receive WIPO documents as part of our transformation project. This implementation is planned for October 2025. This will enable us to implement the ST92 standard at a later date but will need to be assessed against other priorities. |
| HN | The office has not yet addressed the transition to ST.92 to share data in XML format, given that national law already has a procedure in place. |
| HR | SIPO issues patent priority documents only in paper form. |
| IS | Development of a plan and/or implementation progress is being discussed. |
| KE | We haven't developed a plan yet. |
| KG | Outdated IT infrastructure and a shortage of qualified specialists; legal and regulatory uncertainties; as well as issues of integration and interoperability with WIPO DAS and internal systems. |
| LT | We need more time to prepare. |
| MC | * Our back office will be restructured within the next three years and adapted to create files in the WIPO Standard ST.92 format. * The standards for the validation of certified electronic signatures in Monaco are not formally recognized elsewhere in Europe, and vice versa. This is because European Union Regulation No. 910/2014, which standardizes secure economic transactions within the European Union, does not yet apply to Monaco despite the substantially identical technical standards. |
| MX | WIPO DAS is currently used to exchange PDF documents, so its implementation would have to be reviewed to ensure compliance with the provisions of WIPO Standard ST.92. |
| PE | Multiple constraints are hindering the development of a transition plan to exchange patent priority documents in WIPO Standard ST.92 format. They include limited staff and financial resources, as we are focused on upgrading the industrial property system. Another issue is the cost of procuring tools and adapting the technological infrastructure. We also need assistance with tools and specific technical training for staff on implementing WIPO Standard ST.92, which is key to a successful and efficient transition. |
| PL | There are no particular reasons or challenges, internal work is underway to prepare the plan. |
| SE | We have a lot of high prioritized IT projects ongoing and have not been able to prioritize this activity yet. |
| SG | We are currently engaged in other technical commitments, which are expected to be completed by the mid of next year. Once those are finalized, we will assess the need to adopt the standard and, if necessary, develop an appropriate transition plan. |
| SV | No exchange of this type has been implemented. |
| TT | Changes may be needed in legislation prior. |
| TZ | So far, we do not have laws and regulations that permit our country to have an exchange of priority documents. In addition to that, our IT infrastructure is not fully developed to facilitate the exchange of documents |
| US | USPTO reasons and challenges are discussed in the responses to Questions 10-12. |

1. Is your Office or Organization confident that it can complete the required changes in policy, laws, regulations, and/or IT systems by the tentative sunset date of July 1, 2027?

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| **Response** | **ST.3 Code** | **Total** |
| Yes | AU, BR, CH, DE, DO, EA, EP, FI, GB, GE, IL, IS, JO, KE, LT, NO, PL, SV, TR and US. | 20 |
| No | BG, CA, CN, EM, ES, HN, HR, JP, KG, KR, MC, MX, PE, SE, SG, TT and TZ. | 17 |

* 1. What would be your preferred sunset date?

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| **Response** | **ST.3 Code** | **Total** |
| December 2027 | BG and ES. | 2 |
| July 2028 | KG, MC, MX, SE and SG. | 5 |
| Another date | CA, CN, EM, HN, HR, JP, KR, PE, TT and TZ. | 10 |

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| **ST.3 Code** | **Response (if “Another date”)** |
| CA | We cannot at this time predict a target date |
| CN | If the WIPO Standard ST.92 implement project is approved, the ST.92 implement will be completed by July 1, 2027. |
| EM | EUIPO is not affected by the proposed sunset date (it is only for patents), but we have been requested to answer some of the topics of the survey, and this item is set as mandatory. |
| HN | Not defined. |
| HR | SIPO Croatia would prefer to wait for CWS recommendations on trademark and industrial design priority documents before making final decisions about date for implementing the new WIPO Standard ST.92. |
| JP | We would like to request a sunset date after January 2028. However, due to the circumstances of the JPO system, we do not wish for the start date of the transition period (which includes the un-packaging conversion from the new standard format priority documents to the current format priority documents by WIPO DAS, and the packaging conversion from the current format priority documents to the new standard format priority documents) to be later than January 2028. |
| KR | After 2028 (subject to change depending on the legislative amendment schedule) |
| PE | December 2028 |
| TT | 2029 |
| TZ | Not sure. |

1. Assuming that WIPO Digital Access Service (DAS) will support the Priority Document Data Package (PDDP) of ST.92 and legacy PDF formats, how does your Office or Organization plan to provide priority documents during the transition period?  Please select all that apply.

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| **Response** | **ST.3 Code** | **Total** |
| PDDP | AU, BR, DE, EA, EM, FI, JO, KE, KR, MC and NO. | 11 |
| PDF (legacy) | AU, BG, BR, CA, CH, CN, DE, DO, EA, EM, EP, ES, FI, GB, GE, HN, IL, IS, JO, JP, KE, KG, KR, LT, MC, MX, NO, PE, SE, SV, TR, TT, TZ and US. | 34 |
| Paper | BG, DE, FI, HR, LT, PL and TT. | 7 |
| Other | DE, EM, PL, SG and US. | 5 |

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| **ST.3 Code** | **Response (if “Other”)** |
| DE | Explanation for checkbox selection: Electronic priority documents are only issued for depositing in WIPO DAS. Until the introduction of the standard St.92 in DPMA, this is done as PDF, thereafter as PDDP only. We assume that the changeover will take place during the transition period. Priority documents are still issued on paper on request (with costs). |
| EM | EUIPO currently uses WIPO DAS only for designs and there is no plan in place at the current stage to activate it in trademarks. We understand WIPO Standard ST.92 to be applicable to all forms of communication (not just via WIPO DAS). |
| PL | PDF documents are signed with a qualified electronic seal and qualified electronic signature. |
| SG | We are not currently utilizing the WIPO DAS system. |
| US | Legacy PDF until the agreed upon sunset date, unless USPTO concerns raised in the responses to the subsequent questions can be adequately addressed to allow for a transition phase. |

1. Does your Office or Organization plan to provide data in the Supplementary Artifact folder as part of the initial implementation?

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| **Response** | **ST.3 Code** | **Total** |
| Yes (please indicate which files you plan to include) | EM, EP, JO, KG, KR and US. | 6 |
| No | AU, BG, BR, CA, CH, CN, DE, DO, EA, ES, FI, GB, GE, HN, HR, IL, IS, JP, KE, LT, MC, MX, NO, PE, PL, SE, SG, SV, TR, TT and TZ. | 31 |

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| **ST.3 Code** | **Response (if “Yes, indicate which files you plan to include”)** |
| EM | For designs, we may provide the registration certificate. |
| EP | Originally filed docX documents, where available. |
| JO | The supplementary artifact folder may include certified copies, translation documents, and any additional legal justifications that support the validity of the priority claim. |
| KG | Our organization plans to provide data in the SupplementaryArtifacts folder as part of the initial implementation of ST.92. Yes – the following categories of files will be included: Sequence listings (original ST.26 files) Bibliographic metadata (XML) Classification data (XML) Full application text (XML or DOCX) Drawings (TIFF/PNG) Cover letter (DOCX or PDF). |
| KR | Application.xml, ClassificationData.xml, Drawing Sheet, Multimedia File, Image referenced by the XML document. |
| US | We are considering including higher quality PDF drawings as originally submitted in supp folder. |

1. Does your Office or Organization, in its capacity as the providing Office, have any legal or policy concerns regarding the PDDP being stored by WIPO DAS for future access and subsequently made available to the recipient Office?

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| **Response** | **ST.3 Code** | **Total** |
| Yes (please explain) | BG, EM and US. | 3 |
| No (please explain) | AU, BR, CA, CH, CN, DE, DO, EA, EP, ES, FI, GB, GE, HN, IL, IS, JO, JP, KE, KG, KR, LT, MC, MX, NO, PL, SE, TR and TT. | 29 |
| Not applicable as we are not a WIPO DAS participating Office | HR, PE, SG, SV and TZ. | 5 |

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| **ST.3 Code** | **Response (if “Yes”)** |
| BG | It is only applicable when the will of the applicant is given. |
| EM | At current stage we may assume that there will be no concern, but we cannot confirm it until it is clarified if there will be any change in the current terms and conditions of usage of WIPO DAS. |
| US | Our Office has concerns with storing the PDDP by WIPO DAS, except temporarily for successful transmission, as storage for future access may not be in accord with US national law. In addition, storage raises concerns where there is a need for the PDDP package to be deleted its entirety in a quick manner due to change in circumstances provided under US national law (e.g., the U.S. application is later subject to a secrecy order, or the U.S. applicant rescinded its authorization for access). |

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| **ST.3 Code** | **Response (if “No”)** |
| AU | No significant legal or policy concerns with WIPO DAS storing PDDP and providing access to recipient Offices. |
| BR | In our understanding, the PDDP ZIP is simply a way of consolidating files. The information contained in the package — including PDFs and the WIPO Standard ST.26 XML — is already provided to users in our current process. |
| DE | When requesting the depositing of a priority document in WIPO DAS, the applicant must submit declarations of consent. Among other things, these include that the DPMA does not guarantee the security and confidentiality of the data stored outside its sphere of control after transmission in accordance with the request. |
| TR | Our Office has no legal or policy concerns regarding the storage of Priority Documents by WIPO DAS or their subsequent availability to the recipient Office, as this process aligns with our current practices as a providing Office. |

1. Does your Office or Organization, in its capacity as the providing Office, have any legal or policy restrictions regarding the implementation approach where WIPO DAS processes the originally submitted priority document by performing the following actions, only during the agreed transition period:

* packing or unpacking a PDDP ZIP file; and
* generating a PDDP index file, if necessary.

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| **Response** | **ST.3 Code** | **Total** |
| Yes (please explain) | BG, SG and US. | 3 |
| No (please explain) | AU, BR, CA, CH, CN, DE, DO, EA, EM, EP, ES, FI, GB, GE, HN, IL, IS, JO, JP, KE, KG, KR, LT, MC, MX, NO, PL, SE, TR and TT. | 30 |
| Not applicable as we are not a WIPO DAS participating Office | HR, PE, SV and TZ. | 4 |

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| **ST.3 Code** | **Response (if “Yes”)** |
| BG | The national legislation mandates the priority document to be issued on paper on the requirement of the applicant. |
| SG | If we become a providing Office. |
| US | The concern is whether an extracted priority document PDF, or a packaged PDDP file, complies with the applicable national law governing priority documents in foreign jurisdictions. If not, US applicants may be harmed if the extracted priority document (or packaged PDDP file) is not accepted by the foreign jurisdiction. The USPTO cannot answer what is required under the applicable law for other participating offices. This is a question to be posed to all participating offices that might potentially receive an extracted pdoc pdf or WIPO DAS packaged PDDP file. |

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| **ST.3 Code** | **Response (if “No”)** |
| AU | No significant legal or policy concerns with the proposed actions during the transition period. |
| BR | WIPO DAS already handles files in the secrecy period, and we trust that the new process to be implemented is merely a matter of compiling information within a system that is already designed to manage confidential data. |
| DE | There are no concerns regarding the actions mentioned, as the content (semantic information) of the priority document is not falsified/altered. |
| EM | No issue as long as the documents provided inside the PDDP are not modified. |
| TR | Our office is already providing priority document transmission to WIPO DAS as a depositing (providing) office. Therefore, there is no legal restriction in this regard. |

1. Does your Office or Organization, in its capacity as the recipient Office, have legal approval for accepting extracted PDF or PDDP files processed by WIPO DAS?

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| **Response** | **ST.3 Code** | **Total** |
| Yes (please explain) | AU, BG, BR, CA, CN, EP, FI, GB, GE, JP, LT, MC, MX, PL, TT and US. | 16 |
| No (please explain) | CH, DO, EA, EM, ES, HN, IL, IS, JO, KE, KG, KR, NO, SE and TR. | 15 |
| Not applicable as we are not a WIPO DAS participating Office | DE, HR, PE, SG, SV and TZ. | 6 |

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| **ST.3 Code** | **Response (if “Yes”)** |
| AU | IP Australia accepts the transitional workaround. It provides the required information for the purposes of Australian domestic law. |
| BG | The priority document is filed in its entirety. |
| BR | In our understanding, there will be no change in the in the procedure when acting as the recipient Office. We will continue downloading the sequence list whenever necessary from the PDDP file. Our volume is not big enough to change it from downloading manually. |
| CA | CIPO requires that the applicant make a copy of the previously regularly filed application available to the Commissioner in a digital library that is specified by the Commissioner as being accepted for that purpose and inform the Commissioner that it is so available under Canadian Patent Rule 74(1)(b). |
| CN | Our legal department feedback no legal barrier. |
| EP | For the transitional period extracted PDF or PDDP files processed by WIPO DAS are legally accepted. However, a workflow will need to be put in place for the manual download of potential sequence listings in this transitional period. |
| FI | Finnish Patent decree section 11 provides the applicant to submit the priority documents to International Bureau, from where Finnish Patent Authority may request documents as provided by PCT Rule 17.2. |
| GB | This aligns with our current practice. |
| GE | Article 22, paragraph 4 of the "Instruction on Procedures Related to Drafting and Filing Applications for Inventions and Utility Models and Granting a Patent," approved by Order №1 of the Chairman of the Legal Entity of Public Law – National Intellectual Property Center of Georgia (Sakpatenti) on January 12, stipulates that it is also possible to submit the document referred to in paragraph 3 of the same Article via the WIPO DAS system. Accordingly, once the WIPO DAS system supports the PDDP format, Sakpatenti will be able to accept such documents in that format. During the transition period, if WIPO DAS supports both PDF and PDDP formats (prior to July 1, 2027), Sakpatenti will accept priority documents in PDF format. The Office has no legal barrier to accepting extracted PDF or PDDP files processed by WIPO DAS under the transitional mechanism described. Besides, the applicant always has an option to submit hard copy of the priority documents. |
| JP | We have considered it from a legal perspective and found no concerns. |
| LT | There is a responsible employee in the institution who has the granted authorizations and the necessary logins. |
| MX | As indicated in the example, as from when we, as the receiving office accept PDF and XML formats for sequence listings. |
| PL | We will download the documents manually. |
| TT | The Electronic Transactions Act allows for the receipt of such documents as if they were paper. |
| US | Our Office has concerns with the integrity of the file extracted and/or created by WIPO DAS. We would like to know what quality control is envisioned for the extraction or PDDP file creation by WIPO DAS so that we have an assurance that the document provided by another IP office to the USPTO is authentic and complete and complies with the requirements of our national law (37 CFR1.55(i)(3)). We also have a concern with a specific scenario where the providing Office provides a PDDP file that includes a sequence listing file in XML/TXT format, but only the WIPO DAS extracted PDF is provided to the USPTO. That would be problematic under US national law (37 CFR 1.55(i)(3)), as the USPTO would not be receiving the copy of the foreign application from the participating office, but rather something less than what was provided by the participating office as the copy of the priority application. |

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| **ST.3 Code** | **Response (if “No”)** |
| EM | No issue as long as the documents provided inside the PDDP are not modified. |
| IL | We have not yet discussed the implications of such procedures. |
| TR | In order for our office to act as a receiving office (recipient office), an amendment to the Law and/or Regulation is required. Therefore, legal approval is not available. |

1. If your Office or Organization also provides and/or accepts priority documents relating to industrial designs and trademarks (which are not yet covered by WIPO Standard ST.92), will it provide such documents as legacy (e.g., PDF) files while at the same time providing patent priority documents as ST.92 PDDP files?

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| **Response** | **ST.3 Code** | **Total** |
| Yes, my Office/Organization will continue to provide and/or accept priority documents relating to industrial designs and trademarks as legacy (e.g., PDF) | AU, BR, CA, CH, CN, DE, DO, EM, GE, IL, IS, JO, KE, KG, KR, LT, MX, NO, PE, PL, SE, SG, TR, TT and TZ. | 25 |
| No, my Office/Organization plans to provide and/or accept priority documents relating to patents, industrial designs, and trademarks in PDDP format once the ST.92 is revised | BG, EA, ES, FI, HN, HR, JP, MC and SV. | 9 |
| Not Applicable, my Office/Organization does not provide and/or accepts priority documents relating to industrial designs and trademarks | EP, GB and US. | 3 |

1. Does your Office or Organization support a big bang approach to the implementation of WIPO Standard ST.92?

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| **Response** | **ST.3 Code** | **Total** |
| Yes | AU, BR, CN, DE, DO, EM, ES, FI, GE, HN, HR, IL, IS, JO, KE, LT, MX, PE, PL, SG, TR and US. | 22 |
| No (please provide reasons) | BG, CA, CH, EA, EP, GB, JP, KG, KR, MC, NO, SE, SV, TT and TZ. | 15 |

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| **ST.3 Code** | **Response (if “No”)** |
| BG | Each Office should decide individually. |
| CA | We have concerns with this approach for CIPO acting as ISA/IPEA (our PCT IT systems) and our national entry (CIPO as elected/designated office) and national IT systems. |
| CH | This would give the Offices more flexibility. |
| EA | We would prefer PDDP and PDF formats to circulate in parallel for some years. IPOs would thus have more flexibility in their implementation plans. Agreed sunset date is also possible, but later than July 1, 2027. |
| EP | As mentioned above, the EPO has already developed an electronic priority documents service, partially aligned with WIPO Standard ST.92. |
| GB | Although we believe we can complete the required changes for the tentative sunset date of 1 July 2027. If we do encounter conflicting priorities or unexpected issues, then we or other offices may not be able to meet that date. |
| JP | Adopting a big bang approach has the advantage of eliminating the need for operations during the transition period. However, given that many offices and organizations, including the five large offices, are participating in WIPO DAS, the impact of a failure to switch to the new standard is likely to be greater than if each office were to transition to the new standard individually within the sunset period. |
| KG | Our Office does not support a big-bang implementation of ST.92. We recommend a phased approach to minimize technical, operational, and legal risks, ensure IT-system compatibility, and incorporate user feedback prior to full-scale deployment. |
| KR | Launching all national systems simultaneously has been deemed unfeasible, so KIPO expects WIPO DAS to effectively serve its intermediary role as each office opens its system when ready. |
| MC | We do not yet know when our Office will be ready. |
| NO | A big bang approach should preferably cover all three domains, and would need a longer preparation period, hence the sunset day must be delayed. |
| SE | We do not yet have an implementation plan, so this question is not applicable. |
| SV | The implementation of WIPO Standard ST.92 should be reviewed, along with any potential implications. |
| TT | This cannot be a yes or no approach as there must be provision for transition and extenuating circumstances to retain both for some time. |
| TZ | This requires internal legal and policy restructuring for the country to participate into WIPO Standard ST.92 priority document packages |

[Annex II follows]