

1. Issues 1-6 focus on whether AI can be the subject of responsibility in the field of IP. Concerns like this are of great importance.

A question is suggested to be added under these issues: if AI can act as patent applicant or owner, while not being able to bear possible risks or related obligations, will or can the R&D personnel and institutions of AI systems shoulder relevant risks? If we want the AI system to be the subject of patent ownership, we should first confirm whether the AI system can serve as the subject of responsibility, since rights and obligations are two sides of a coin.

2. It is suggested that “(iiii) whether the ‘moral right’ of original literary and artistic works created by AI should be identified” be added under issue 6: Authorship and Ownership.

Literary and artistic works are the embodiment of the author’s personality, which is the author’s “moral right” in *the Copyright Law*. According to *the Copyright Law of the People’s Republic of China*, moral rights consist of “the right of authorship”, “the right of publication”, “the right of alternation” and “the right of integrity”. Is AI, the creator of original literary and artistic works entitled to these rights? Should AI designers enjoy these rights instead? Or works like these do not involve “moral rights” at all?

3. Issue 11: how could AI-assisted design be protected.

In this particular scenario, AI technology is used as a general CAD tool instead of a subject of responsibility. Thus relevant IP rules shall be regulated according to the rules of general CAD.

4. Algorithm is suggested to be listed as an individual issue.

“Algorithm” is the core of AI, and in many cases the most innovative part. Algorithm is not only a matter of disclosure, but a system that deserves separate discussion.

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