Institute for Public Representation
Georgetown Law
600 New Jersey Ave. NW
Washington, DC 20001
202.662.9535 (phone)
202.662.9634 (fax)

October 9, 2012

via hand delivery

FILED/ACCEPTED

OCT - 9 2012

Federal Communications Commission
Office of the Secretary

Marlene H. Dortch, Secretary
Office of the Secretary
Federal Communications Commission
445 12th Street, SW, Room TW-A325
Washington, DC 20554

Attn: CGB Room 3-B431

Re: **Edgewood Baptist Church Petition for Exemption from the Commission's Closed Captioning Rules**
Case No. CGB-CC-0201
CG Docket No. 06-181

Dear Ms. Dortch:

Pursuant to the Commission's Request for Comment, Telecommunications for the Deaf and Hard of Hearing Inc. (TDI), the National Association of the Deaf (NAD), the Deaf and Hard of Hearing Consumer Advocacy Network (DHHCAN), the Association of Late-Deafened Adults (ALDA), California Coalition of Agencies Serving the Deaf and Hard of Hearing (CCASDHH), and the Cerebral Palsy and Deaf Organization (CPADO), collectively, "Consumer Groups," respectfully submit this opposition to the petition of Edgewood Baptist Church ("Edgewood") to exempt its program from the Commission's closed captioning rules, 47 C.F.R. § 79.1.[1] Consumer Groups oppose the

[1] *Public Notice, Request for Comment: Request for Exemption from Commission's Closed Captioning Rules*, CG Docket No. 06-181 (September 6, 2012), http://transition.fcc.gov/Daily_Releases/Daily_Business/2012/db0906/DA-12-1447A1.pdf; *Edgewood Petition for Exemption*, Case No. CGB-CC-0201, CG Docket No. 06-181 (December 20, 2011), http://apps.fcc.gov/ecfs/document/view?id=7021754799 ("*Edgewood Petition*"). The Consumer and Governmental Affairs Bureau initially determined that the *Edgewood Petition* was deficient because it did not include verification that Edgewood sought

No. of Copies rec'd 0+2
List ABCDE

petition because it does not sufficiently demonstrate that Edgewood diligently sought out the lowest rate to caption its programming, that it cannot afford closed captioning, or that it has exhausted alternative avenues to fund captioning.

Consumer Groups acknowledge Edgewood's efforts to "share Christ with the community."[2] Edgewood's requested exemption, however, would deny equal access to its programming to community members who are deaf or hard of hearing. Maximizing accessibility through the comprehensive use of closed captions is critical to ensuring that all viewers can experience the important benefits of video programming on equal terms.

Because the stakes are so high for the millions of Americans who are deaf or hard of hearing, it is essential that the Commission grant petitions for exemptions from captioning rules only in the rare case that a petitioner conclusively demonstrates that captioning its programming would impose a truly untenable economic burden. To make such a demonstration, a petitioner must present detailed, verifiable, and specific documentation that it cannot afford to caption its programming, either with its own revenue or with alternative sources.

Under section 713(d)(3) of the Communications Act of 1934 ("1934 Act"), as added by the Telecommunications Act of 1996 Act ("1996 Act")[3] and amended by section 202(c) of the 21st Century Communication and Video Accessibility Act of 2010 ("CVAA"),[4] "a provider of video programming or program owner may petition the Commission for an exemption from the [closed captioning] requirements of [the 1934

---

closed captioning assistance or an affidavit supporting the petition. *Letter from the Consumer and Governmental Affairs Bureau*, Case No. CGB-CC-0201, CG Docket No. 06-181 (March 7, 2012), http://apps.fcc.gov/ecfs/document/view?id=7021902648 ("*CGB Letter*"). Edgewood then filed a supplement. *Edgewood Supplement*, Case No. CGB-CC-0201 (April 3, 2012), http://apps.fcc.gov/ecfs/document/view?id=7021918810.

[2] *Edgewood Petition* at 1.

[3] Pub. L. 104-104, 110 Stat. 56 (codified as amended at 47 U.S.C. § 613(d)(3)).

[4] Pub. L. 111-260, 124 Stat. 2751 (codified at 47 U.S.C. § 613(d)(3)).

Act], and the Commission may grant such petition upon a showing that the requirements . . . would be economically burdensome." In its July 20, 2012 Report and Order, the Commission formally adopted the analysis set forth in its October 20, 2011 Interim Standard Order and Notice of Proposed Rulemaking.[5] In doing so, the Commission interpreted the term "economically burdensome" as being synonymous with the term "undue burden" as defined in section 713(e) of the 1934 Act and ordered the Consumer and Governmental Affairs Bureau to continue to evaluate all exemption petitions using the "undue burden" standard pursuant to the Commission's amended rules in 47 C.F.R. § 79.1(f)(2)-(3).[6]

To satisfy the requirements of section 713(e), a petitioner must first demonstrate its inability to afford providing closed captions for its programming.[7] If a petitioner sufficiently demonstrates an inability to afford captioning, it must also demonstrate that it has exhausted alternative avenues for obtaining assistance with captioning.[8] Where a petition fails to make either of those showings, it fails to demonstrate that providing

---

[5] The *Interim Standard Order* and the *NPRM* were part of a multi-part Commission decision. *See Anglers for Christ Ministries, Inc., New Beginning Ministries, Petitioners Identified in Appendix A, Interpretation of Economically Burdensome Standard; Amendment of Section 79.1(f) of the Commission's Rules; Video Programming Accessibility,* Memorandum Opinion and Order, Order, and Notice of Proposed Rulemaking, CG Docket Nos. 06-181 and 11-175, 26 FCC. Rcd. 14941 (Oct. 20, 2011) (*"Anglers 2011"*).

[6] *Report and Order, Interpretation of Economically Burdensome Standard; Amendment of Section 79.1(f) of the Commission's Rules; Video Programming Accessibility,* CG Docket No. 11-175, ¶ 8 (July 20, 2012) (*"Economically Burdensome Standard Order"*). In some early adjudications, the Commission specifically analyzed exemption petitions under the four-factor rubric in section 713(e), analyzing whether each of the four factors weighed for or against granting a particular petition. *E.g., Home Shopping Club L.P.*, Case No. CSR 5459, 15 FCC Rcd. 10,790, 10,792-94 ¶¶ 6-9 (CSB 2000). Over the past decade, however, this factor-based analysis has evolved into several specific evidentiary requirements that must be satisfied to support a conclusion that a petitioner has demonstrated an undue economic burden sufficient to satisfy the requirements of section 713(e). *See Anglers 2011*, 26 FCC Rcd. at 14,955-56, ¶ 28.

[7] *See Anglers 2011*, 26 FCC Rcd. at 14,955-56, ¶ 28.

[8] *See id.*

captions would be economically burdensome, and the Commission must dismiss the petition.[9]

I. Edgewood's Ability to Afford Captioning

To sufficiently demonstrate that a petitioner cannot afford to caption its programming, a petition must provide both verification that the petitioner has diligently sought out and received accurate, reasonable information regarding the costs of captioning its programming, such as competitive rate quotes from established providers, and detailed information regarding the petitioner's financial status.[10] Both showings must demonstrate that the petitioner in fact cannot afford to caption its programming and eliminate the possibility that captioning would be possible if the petitioner reallocated its resources or obtained more reasonable price quotes for captioning its programming.

A. The Cost of Captioning Edgewood's Programming

To successfully demonstrate that captioning would be economically burdensome, a petitioner must demonstrate a concerted effort to determine "the most reasonable price" for captioning its programming.[11] To allow the Commission and the public to evaluate whether a petitioner's cost estimates are reasonable, it is essential that a petition provide, at a bare minimum, detailed information about the basis and validity of cost estimates for captioning, such as competitive hourly rate quotes and associated correspondence from several established captioning providers.[12]

---

[9] *See id.*

[10] *See id.*

[11] *See The Wild Outdoors*, Case No. CSR 5444, 16 FCC Rcd. 13,611, 13,613-14 ¶ 7 (CSB 2001), *cited with approval in Anglers 2011*, 26 FCC Rcd. at 14,956, ¶ 28 n.101.

[12] *Compare, e.g., Outland Sports, Inc.*, Case No. CSR 5443, 16 FCC Rcd. 13,605, 13,607, ¶ 7 (CSB 2001) (approving of a petitioner's inclusion of rate quotes and associated correspondence from at least three captioning providers in its petition) *with The Wild Outdoors*, 16 FCC Rcd. at 13,613-14, ¶ 7 (disapproving of a petitioner's bald assertion of the cost to caption a program without supporting evidence).

Edgewood estimates that the cost of closed captioning its half-hour program would be $450 per week.[13] Edgewood also asserts that captioning would require it to incur some unspecified "'in kind' cost that would be associated with the various volunteer man hours necessary for the completion of the program."[14]

In support of its already incomplete estimate, Edgewood provides only a page apparently printed from a caption vendor's website, and provides no evidence that it contacted multiple caption providers or attempted to negotiate with any of them for a more affordable rate.[15] Moreover, it is unclear that the vendor listed by Edgewood even exists, as the URL http://customcaptions.com/ cited in Edgewood's petition points to a Japanese patent law website and includes none of the information listed in Edgewood's petition.[16] Without more information, it is impossible to conclude that Edgewood has made the necessary good faith effort to determine the most reasonable price of captioning its programming before turning to the exemption process as a last resort.

B. Edgewood's Financial Status

Even assuming Edgewood had submitted a reasonable assessment of the cost of captioning its programming, Edgewood has not presented sufficient information about its financial status to demonstrate that it cannot afford captioning. A successful petition requires, at a bare minimum, detailed information regarding the petitioner's finances and assets, gross or net proceeds, and other documentation "from which its financial condition can be assessed" that demonstrates captioning would present an undue economic burden.[17]

---

[13] *Edgewood Petition* at 2.
[14] *Id.* at 2.
[15] *Id.* at 6.
[16] *See id.* (citing http://customcaptions.com/). Printouts of the website as it currently appears on October 1, 2012, and as it appears translated from Japanese to English by Google Translate, are attached to this opposition.
[17] *E.g., Survivors of Assault Recovery*, Case No. CSR 6358, 20 FCC Rcd. 10,031, 10,032, ¶ 3 (MB 2005), *cited with approval in Anglers 2011*, 26 FCC Rcd. at 14,956, ¶ 28 n.100.

Edgewood first contends that closed captioning would "in effect double what it costs to produce and air our program."[18] The specific budget for Edgewood's programming, however, is irrelevant to the Commission's determination. When evaluating the financial status of a petitioner, the Commission "take[s] into account the overall financial resources of the provider or program owner," not "only the resources available for a specific program."[19]

Edgewood also notes that it is a tax-exempt non-profit entity.[20] But as the Commission has plainly stated, granting petitioners "favorable exemption treatment because of their non-profit status [is] inconsistent with . . . Commission precedent."[21] The Commission has "specifically rejected requests by commenters to adopt a categorical exemption for all non-profit entities based solely on their non-profit status" and has "chose[n] instead to adopt revenue-based exemption standards that . . . focus on the economic strength of each [petitioner]."[22] An entity's non-profit status does not suggest, much less preclude, the possibility that it cannot afford to caption its programming.

Despite Edgewood's non-profit status, it brought in more than $830,000 in just the first eleven months of 2011.[23] While Edgewood claims that its budget is short $44,695.72 of its year-to-date requirement, its petition does not include a full year of financial information that might demonstrate whether Edgewood in fact carried a loss or brought in sufficient revenue to cover the shortfall from the earlier part of the year in the final month of the year.[24]

---

[18] *Edgewood Petition* at 2.
[19] *Anglers 2011*, 26 FCC Rcd. at 14,950, ¶ 17.
[20] *Edgewood Petition* at 2.
[21] *Anglers* 2011, 26 FCC Rcd. at 14, 951, ¶ 18.
[22] *Id.* at 14,950-51, ¶ 18 (citations omitted).
[23] *Edgewood Petition* at 7.
[24] *Id.*

Even if Edgewood had operated at a loss of $44,695.72, it does not follow that Edgewood cannot afford to caption its programming.[25] More specifically, Edgewood spends $44,700 annually to air its programming without captioning[26] - an amount that represents nearly the entirety of Edgewood's annual operating deficit in the first 11 months of 2011. Moreover Edgewood had more than $317,868.79 on hand, including $37,297.30 in its "General Fund," and another $13,580.29 in undeposited revenue, as of November 30, 2011.[27] Edgewood's on-hand funds apparently permit it to shoulder the substantial cost of its television ministry. Without further explanation, it is impossible to conclude that Edgewood can afford to operate its television ministry at a substantial loss but cannot afford to dedicate even a small fraction of its substantial assets toward captioning its programming.

II. Alternative Avenues for Captioning Assistance

Even where a petition succeeds at demonstrating that a petitioner cannot afford to caption its programming, the petitioner must also demonstrate that it has exhausted all alternative avenues for attaining assistance with captioning its programming.[28] A petitioner must provide documentation showing that it has sought assistance from other parties involved with the creation and distribution of its programming,[29] sought sponsorships or other sources of revenue to cover captions, and is unable to obtain alternative means of funding captions.[30]

Even if Edgewood had demonstrated that it could not afford to caption its programming, Edgewood provides nothing more than a letter from its video

---

[25] *Id.* at 7.
[26] *Id.* at 2.
[27] *Id.* at
[28] *Anglers 2011*, 26 FCC Rcd. at 14,955-56, ¶ 28 (internal citations omitted).
[29] *See, e.g., Engel's Outdoor Experience*, Case No. CSR 5882, 19 FCC Rcd. 6867, 6868, ¶ 3 (MB 2004), *cited with approval in Anglers 2011*, 26 FCC Rcd. at 14,956, ¶ 28 n. 102.
[30] *See Outland Sports*, 16 FCC Rcd. at 13607-08, ¶ 7, *cited with approval in Anglers 2011*, 26 FCC Rcd. at 14,956, ¶ 28 n. 103.

programming distributor noting that the distributor is not "equipped to provide captioning service" for Edgewood's program.[31] The letter indicates that the distributor lacks the *technical* ability to provide closed captioning, but does not indicate that Edgewood requested *financial* assistance from the distributor in funding captions, for which the distributor bears responsibility under the FCC's captioning rules.[32] Edgewood also provides no evidence that it made attempts to seek out sponsors or other means of funding captions for its programming. Without further information, it is impossible to conclude that Edgewood has sufficiently attempted to obtain alternative funding for captioning its program.

III. Conclusion

Edgewood's petition does not sufficiently demonstrate that Edgewood diligently sought out the lowest rate to caption its programming, that it cannot afford closed captioning, or that it has exhausted alternative avenues to fund captioning. Accordingly, we respectfully urge the Commission to dismiss the petition and require Edgewood's programming to comply with the closed captioning rules.

---

[31] *Edgewood Supplement* at 3.

[32] *See generally* 47 C.F.R. § 79.1(b).

Respectfully submitted,

Blake E. Reid†
October 9, 2012

Counsel for Telecommunications for the Deaf and Hard of Hearing, Inc.

Institute for Public Representation
Georgetown Law
600 New Jersey Ave. NW
Washington, DC 20001
202.662.9545
blake.reid@law.georgetown.edu

cc: Roger Holberg, Consumer & Governmental Affairs Bureau
Traci Randolph, Consumer & Governmental Affairs Bureau

† Counsel thanks Georgetown Law student Jessica Lee for her assistance in preparing these comments.

Telecommunications for the Deaf and Hard of Hearing, Inc. (TDI)

_____/s/_____

Claude Stout, Executive Director • cstout@TDIforAccess.org
Contact: Jim House, Director of Public Relations • jhouse@TDIforAccess.org
8630 Fenton Street, Suite 121, Silver Spring, MD 20910
www.TDIforAccess.org

National Association of the Deaf (NAD)

_____/s/_____

Howard Rosenblum, Chief Executive Officer • howard.rosenblum@nad.org
Contact: Shane Feldman, Chief Operating Officer • shane.feldman@nad.org
8630 Fenton Street, Suite 820, Silver Spring, MD 20910
301.587.1788
www.nad.org

Deaf and Hard of Hearing Consumer Advocacy Network (DHHCAN)

_____/s/_____

Contact: Cheryl Heppner, Vice Chair • CHeppner@nvrc.org
3951 Pender Drive, Suite 130, Fairfax, VA 22030

Association of Late-Deafened Adults (ALDA)

_____/s/_____

Contact: Brenda Estes, President • bestes@endependence.org
8038 Macintosh Lane, Rockford, IL 61107

California Coalition of Agencies Serving the Deaf and Hard of Hearing (CCASDHH)

_____/s/_____

Contact: Sheri A. Farinha, Vice Chair • SFarinha@norcalcenter.org
4708 Roseville Rd, Ste. 111, North Highlands, CA 95670
916.349.7500

Cerebral Palsy and Deaf Organization (CPADO)

_____/s/_____

Contact: Mark Hill, President • deafhill@gmail.com
1219 NE 6th Street #219, Gresham, OR 97030
503.468.1219

CERTIFICATION

Pursuant to 47 C.F.R. §§ 1.16 and 79.1(f)(9), I, Claude Stout, Executive Director, Telecommunications for the Deaf and Hard of Hearing, Inc. (TDI), hereby certify under penalty of perjury that to the extent there are any facts or considerations not already in the public domain which have been relied on in the foregoing document, these facts and considerations are true and correct to the best of my knowledge.

Claude L. Stout

Claude Stout
October 9, 2012

CERTIFICATE OF SERVICE

I, Niko Perazich, Office Manager, Institute for Public Representation, do hereby certify that, on October 9, 2012, pursuant to the Commission's aforementioned Request for Comment, a copy of the foregoing document was served by first class U.S. mail, postage prepaid, upon the petitioner:

Edgewood Baptist Church
3564 Forrest Road
Columbus, GA 31907

Niko Perazich
October 9, 2012

特許申請と実用新案登録

1．特許・実用新案とは

特許とは、ある発明に対して、その発明を業として実施する権利を日本国で独占排他的に認めるという、特許法に基づく行政処分を特許といいます。
実用新案とは、ある考案のうち、実用新案法に基づき、その考案を業として実施する権利を日本国で独占排他的に得ようと手続きするものを実用新案といいます。
このように、特許も実用新案も、特許法と実用新案法という法律により定められた制度であることをご理解いただけると思います。では次に、これらの法律の制定の目的や用語の定義を見ていくことにしましょう。

まず、これらの法律の制定の目的は、「発明の保護及び利用を図ることにより、発明を奨励し、もつて産業の発達に寄与することを目的とする」（特許法第一条）とし、「物品の形状、構造又は組合せに係る考案の保護及び利用を図ることにより、その考案を奨励し、もつて産業の発達に寄与することを目的とする」（実用新案法一条）としています。以上の法律制定の目的から、特許や実用新案の制度が、発明や考案の保護を図り、利用を図る制度であることをご理解いただけると思います。
発明や考案の保護とは、具体的にはその発明や考案を業として実施する権利を、一定の期間の間、日本国で独占排他的に認めることで保護しています。独占排他的ということですから、特許権者や実用新案権者でなければ、その発明や考案を業として実施することができない、ことになります。正当な権利のない者が、業として実施すれば権利者の権利を侵害したことになり、損害賠償の責めを負い、刑事罰を受けるということで、その発明や考案を保護していることになります。

では、どんな発明や考案が、保護を図り、利用を図る対象とされているのでしょうか。法律で定めている用語の定義を見ていきましょう。
特許法でいう「発明」とは、「自然法則を利用した技術的思想の創作のうち高度のもの」（特許法第二条第一項）とされ、実用新案法でいう「考案」とは、「自然法則を利用した技術的思想の創作」（実用新案法第二条第一項）とされています。さらに、「考案」は、前述の法制定の目的のとおり「物品の形状、構造又は組合せに係る考案」に範囲を限定

メニュー
1．特許・実用新案とは
1．1　特許と実用新案の違い
1．2　特許を取るメリット
1．3　実用新案を取るメリット
2．保護を受けることができる発明・考案とは
2．1　保護を受けることができる発明
2．2　保護を受けることができる実用新案
3．出願の手続きとは
3．1　出願書類
3．2　出願手続きの流れ
3．3　国際出願
4．特許権・実用新案権とは
4．1　侵害
4．2　実用新案技術評価

しています。
「発明」も「考案」も、「自然法則を利用した技術的思想の創作」である点で同じとされています。では「自然法則を利用する」とは、どういうことでしょう。一定条件のもとで常に成立すると考えられる自然界の事物相互の科学的関係（法則）を利用するものでなければなりません。逆に例えば、文字や数字の組合せを利用して暗号を作成する方法は、自然法則を利用していません。また、遊戯やスポーツのゲーム、金融保険制度・課税方法なども人為的な取り決めであり、自然法則を利用していません。従ってこれらは、保護の対象とはなりません。

次に「技術的思想」とは、どういうことでしょう。個別の物品を作ったり、加工したり、操作したり、処理する方法や手段である技術そのものである必要はありませんが、方法や手段に関する思想である必要があります。
次に「創作」ですが、発明をした時点を基準として考えられ、いままでにない、新しいと主観的に意識したものという程度の軽い意味とされています。客観的な判断は、後述の先願要件で判断されるためです。「発明」の場合には、「高度のもの」と定義されています。このような比較用語で表現されているのは、実用新案法の「考案」との比較関係からで、「発明」は「考案」に含まれる部分のうち、技術水準の低い裾の部分は「発明」に含めない趣旨とされています。

「考案」は、その対象が「物品の形状、構造又は組合せ」に限定されていることを説明しましたが、「発明」にはそのような限定はなく、「物品の形状、構造又は組合せ」を離れて、物品（物質も、プログラムも含む）そのものも発明の対象となります。更に物品を離れて、物を生産する方法も、物を生産する以外の一般の方法（検査方法、エネルギー収集・変換方法など）も発明の対象となります。

では、以上に説明した特許の制度や実用新案の制度を利用して、自分の発明や考案を保護してもらうためには、どうすればいいのでしょう。特許を受けようとする場合には、特許出願という一定の出願手続と審査を経て、実用新案登録を受けようとする場合には、実用新案登録出願という一定の出願手続と審査を経て、保護するに相応しい場合に登録され、特許権や実用新案権という権利が発生します。これらの権利が独占排他的な権利として保護されるのです。
更に詳しくは、ご遠慮なくお尋ねください。

Copyright © 2006 YOUR SITE NAME All Rights Reserved.

Patent application and a utility model registration

One. Patents and utility models

A patent, the patent said administrative sanction on the basis of observed exclusively in Japan exclusively for the present you have the right to be carried out as a business its invention, the Patent Act.
A utility model, referred to as a utility model shall be developed in the proceedings of, trying to get exclusive rights under the monopoly in the Japanese Utility Model Act, implement the idea as a business.
I think in this way, also utility model patents also, can understand that it is a system of law to be determined by law and utility model patent law. Then, we will take a look at the definition of the purpose and terms of the enactment of the law in these.

First, "The purpose of that by promoting the protection and the utilization of the present, to encourage inventions, and thereby to contribute to the development of industry" The purpose of the enactment of these laws, he (Article first Patent Act), "The purpose of that by promoting the shape of goods, protection and utilization of devices relating to the combination or structure, to encourage the idea that, to contribute to the development of industry with" You are (Article Utility Model Act). We think the purpose of the legislation of the above, and you understand that it is a system designed to promote the protection of inventions and, system of patents and utility model, in order to use it.
A certain period of time, and the protection of inventions and devised, in particular are protected by allowing exclusive monopoly in Japan, as well as the right to conduct as a business idea or invention. Exclusive monopoly is that because, unless the holder of utility model right or patent holder, it will not be able to carry out as a business idea or

Menu

One.
Patents and utility models
Difference between the utility model patents and 1.1
1.2 Benefits of patented
The advantage of taking a utility model 1.3
2.
And the present invention, which can be protected by the
The invention can be protected by 2.1
Utility model can be protected by 2.2
3.
Procedures and the applicant
3.1 Application Documents
3.2 Procedures for

invention that, that. By going to have infringed the rights of the right holders who have not legitimate right, but be carried out as a business, liable for damages, and subject to criminal penalties, in that you have to protect the invention and its inventor become.

So, whether it would have been of interest to devise and present what, in order to protect, promote use. I'll take a look at the definition of the terms established by law.
The "what highly advanced creation of technical ideas utilizing a law of nature" and (Article 2 (1) of the Patent Law), and the "invention" says, "The idea," said utility model law in patent law , has been "a creation of technical ideas utilizing a law of nature" and (Article 2, paragraph (1) of the Utility Model Act). "Developed", and further, is to limit the scope "shape of the article, designed according to the structure or combination" as the purpose of the aforementioned legislation.
Also "invented" even "invented", are the same in that it is "a creation of technical ideas utilizing a law of nature". In the "Using the law of nature", What does that mean. I must be the ones that can use the (law) relationship of mutual scientific things in nature that are believed to always hold under certain conditions. For example, how to create a cipher using a combination of letters and numbers are not utilizing a law of nature Gyakuni. It is also an artificial arrangement of game play and sports, as well as how to finance and insurance systems and taxation, we are not utilizing a law of nature. They are therefore not eligible for protection.

Then a "technical concept", does that mean it will. Does not need to be the technology itself is a means or method and make a separate article, or process, manipulate, process, and must be thought about ways and means.
Is "creation" then, is the meaning and extent of light is considered as a reference when you present, ever, that what was new and subjectively conscious. Objective judgment is to

filing

International Application 3.3

4. Patent rights, utility model rights and

4.1 infringement

Technology Assessment 4.2 utility model

be determined by the prior application requirements below. Are defined in the case of "present", and "advanced ones." Among the parts included in the "developed" "present", the relationship between the comparison of the "invention" method utility model, have been expressed in terms such comparisons, the portion of the skirt lower state of the art " It is the spirit and not included in the "present.

"Invention" has been described, "the shape of the article, or combination" structure subject that that it is limited and not limitation such in the "present", "the shape of the article, or combination structure" away, the subject of the present (including the material, but also programs) that those goods. Alternatively, you leave the article further, producing a product, subject of the present method of producing a product other than the general (inspection method, such as energy collection and conversion method) as well.

Now, what happens in order to use the system of institutions and utility model patents described above, have to protect their inventions and devised, can I do it. After the examination and application procedure for certain that the application for a utility model registration, in the case for which a patent is sought, if after the examination and application procedure for certain that the patent application, trying to obtain a utility model registration, you protect registered in the appropriate case to the right of patent rights and utility model rights occurs. These rights is the right to be protected as an exclusive monopoly.
In more detail, please do not hesitate to ask.

---

footerMenu1 footerMenu2 footerMenu3

Copyright © 2006 YOUR SITE NAME All Rights Reserved.