



Michael Heap
Chairman
Intellectual Property Regulation Board
Fifth Floor, Outer Temple
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via e-mail: Michael.Heap@ipreg.org.uk

Dear Michael

IPReg ABS (alternative business structures) – Licensing Consultation

As you may know, the IP Federation represents the views of a wide range of industries operating in the UK, Europe and internationally in intellectual property matters, both policy and practice, including patents and trade marks. Its members are listed at the end of this letter.

I understand that IPReg is holding a consultation on becoming a licensing authority for alternative business structures (ABS) with a closing date of 17 September 2012. Registered patent attorneys and trade mark attorneys working in industry are currently regulated by IPReg as individuals.

The attorneys working in industry are frequently employed by subsidiary companies and carry out work for the parent company and other subsidiaries, or, particularly in the case of UK-headquartered companies, are employed by the parent company and carry out work for the parent and subsidiary companies. Companies employing in-house attorneys do not want to become subject to the ABS regulations.

The IP Federation would appreciate confirmation that IPReg is not intending to include companies employing in-house attorneys within the ABS regulation. The Federation would appreciate being included in any consultation on the ABS regulation and offers to review the draft regulation to ensure in-house IP departments are not inadvertently included in the regulation.

Yours sincerely

Bobby Mukherjee
European Patent Attorney
President, IP Federation

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The IP Federation is the operating name of the Trade Marks, Patents and Designs Federation
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IP Federation members 2012

The IP Federation represents the views of UK industry in both IPR policy and practice matters within the EU, the UK and internationally. Its membership comprises the innovative and influential companies listed below. Its Council also includes representatives of the CBI, and its meetings are attended by IP specialists from three leading law firms. It is listed on the joint Transparency Register of the European Parliament and the Commission with identity No. 83549331760-12.

AGCO Ltd
ARM Ltd
AstraZeneca plc
Babcock International Ltd
BAE Systems plc
BP p.l.c.
British Telecommunications plc
British-American Tobacco Co Ltd
BTG plc
Caterpillar U.K. Ltd
Delphi Corp.
Dyson Technology Ltd
Eli Lilly & Co Ltd
ExxonMobil Chemical Europe Inc
Ford of Europe
Fujitsu Services Ltd
GE Healthcare
GKN plc
GlaxoSmithKline plc
Hewlett-Packard Ltd
IBM UK Ltd
Infineum UK Ltd
Merck Sharp & Dohme Ltd
Microsoft Limited
Nokia UK Ltd
Nucletron Ltd
Pfizer Ltd
Philips Electronics UK Ltd
Pilkington Group Ltd
Procter & Gamble Ltd
Rolls-Royce plc
Shell International Ltd
Smith & Nephew
Syngenta Ltd
The Linde Group
UCB Pharma plc
Unilever plc
Vectura Limited

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