

タイトル	提出先	発信日
英国知的財産庁（UKIPO）標準必須特許に関する意見募集への意見提出	英国知的財産庁	2025 年 10 月

JAMA Comments on the UK IPO SEPs Consultation

The Japan Automobile Manufacturers Association, Inc. (JAMA) is a non-profit industry organisation comprising Japan's fourteen manufacturers of passenger cars, trucks, buses, and motorcycles.

We would like to express our deepest gratitude to the UK Intellectual Property Office for the support they consistently extend to our member companies' business activities in the UK, and submits this response to the consultation on Standard Essential Patents (SEPs) by the IPO.

No	Question	JAMA's answer
Q1	Would an RDT within IPEC meet our objectives of providing fast and efficient rate determinations?	We believe that an RDT within the IPEC could meet the objective of providing fast and efficient rate determination from an expert court under certain conditions. · Although limited to cases where infringement, validity, and substantive issues are not contested, an RDT within the IPEC could help prevent rights holders from demanding excessively high rates by threatening injunctions against implementers. This could be achieved by establishing appropriate rules within the court. · Fair and appropriate deliberation would ensure both promptness and efficiency. · Currently, SEP negotiations lack transparency and predictability, exposing implementers to the risk of unpredictable financial losses. These factors hinder innovation and reduce investment incentives in Europe and the United Kingdom. An RDT could contribute to a more transparent and predictable SEP negotiation environment, particularly if the determinations are published. However, there are significant challenges in relying on comparable rates. In order for the RDT to be a viable, cost-effective solution, UKIPO should first develop predicate valuation tools that are party-agnostic — such as an aggregate royalty.
Q2	Locating an RDT in an existing court structure has advantages, but are there any alternatives that could	We understand the advantages of establishing an RDT within the existing court system. While alternative approaches—such as third-party mediation—may potentially serve a similar function, we believe that placing the RDT within the court would be preferable. This is because we consider it essential to ensure accessibility for all stakeholders, [binding, enforceable

	achieve the government's objectives?	decisions?] and to guarantee the public disclosure of outcomes.
Q3	What are your views on how the government could ensure a rate determination route is accessible to SMEs?	· To promote the use of RDTs by SMEs, their accessibility should be enhanced by allowing them to be utilized at any stage of bilateral negotiations—regardless of whether ADR procedures are in place; and · For SMEs to effectively access RDTs, it is essential that the process does not require excessive costs or preparation, for example by requiring lengthy disclosure/evidence requirements. One such method would be to use top-down valuation based on a pre-established aggregate royalty.
Q4	What should the remit and scope of an RDT be e.g. reasonable licence rates and terms; who brings the claim (licensor, licensee or other parties)?	· The decisions made by the RDT must carry legally binding force, so that decisions can be enforced; · Anyone should be able to request access to the RDT at any stage of the negotiation process, although parties facing liability from the RDT should have their rights to have the matter adjudicated by the UK High Court preserved; and · The RDT should [only] determine UK license rates based on UK patents. · Who should be eligible to file a request: Parties such as rights holders, implementers, and prospective implementers should be able to file a request. In other words, anyone with the potential to implement the technology should be eligible; Additionally, those with a vested interest in rate determination—such as suppliers responsible for patent guarantees—should also be allowed to file a request; Furthermore, any individual or entity should be permitted to provide relevant information to the RDT; and Finally, any implementer should be permitted to initiate an RDT against a patent pool. This would be an important cost-saving measure by reducing the need for multiple, duplicative, rate determinations given that the SEPs at issue are already licensed together.
Q5	Are you aware of any additional evidence or research the IPO could utilise to inform the development of the RDT, or alternatives to the RDT that achieve the same outcomes?	Blank (JAMA will not answer this question.)
Q6	How do you think an RDT should be structured and	· Disclosure of Information through public decision making: Accessibility will be improved if comparable rates are publicly disclosed.

	resourced to be effective and accessible (e.g. composition of a panel with relevant expertise, decision-making processes, procedural rules)?	• Clear procedural rules · Panel Composition: Given the nature of determining binding rates, it is essential to establish multiple panels that include members with technical expertise in addition to standard legal qualifications, while also ensuring neutrality.
Q7	In your view, how would the government's proposed RDT provide efficiencies above and beyond what is available elsewhere in the High Court?	Blank (JAMA will not answer this question.)
Q8	What would be your preferred model to base licence rate calculations? What specific methodologies or principles do you believe should be considered?	We believe that RDTs should consistently possess and disclose multiple relative data sets of FRAND (Fair, Reasonable, and Non-Discriminatory) RATEs. Current challenges include the asymmetry of information between rights holders and implementers, as well as the lack of disclosure of comparable rates. Even if parties do not submit such data as evidence, RDTs should be authorized to use the information ex officio to make informed decisions, thereby ensuring fairness and reducing the burden on both parties. In both InterDigital v. Lenovo and Optis v. Apple, the English courts recognized that there are significant complexities with relying on comparable licenses to establish a FRAND rate. Because of these issues, a reliable outcome based on comparable licenses is likely to be cost-prohibitive. We suggest that any RDT should deploy a top-down approach and rely on an aggregate royalty set externally to the proceedings.
Q9	What factors should determine which calculation method is used, or be taken into consideration (e.g. license facts such as duration, scope, age, term, previous royalty rates, fee structure; and company specific data such as size, sales volume, products)?	In addition to the above, the following factors should be considered: · Setting an upper limit on royalties to prevent royalty stacking; · Assessing the degree of contribution of the invention to the relevant standard; · Determining the unit price based on the smallest saleable patent practicing unit (SSPPU); · Considering the remaining term of the patent; and · Excluding factors unrelated to the application of the technology from the royalty calculation (e.g., EMV). For example, the price of an automobile can vary more than tenfold due to factors unrelated to communication technology—such as engine size, seat quality, and brand value. However, the cost of communication-related components remains relatively constant. Moreover, the cost of an automobile can be hundreds of times that of a smartphone even though they use similar components and implement the same

		version of the cellular standard. Therefore, SEP holders should not be entitled to charge higher fees based on non-standardized features like engine performance or specific end use. Such unrelated factors capture value unrelated to the patented technology and therefore should not be reflected in the royalty calculation.
Q10	Do certain sectors or technologies require their own specific methodology? Please provide examples.	In the context of sectors and technologies related to vehicles and multi-component products, Japan's Ministry of Economy, Trade and Industry (METI) has issued the Guide to Fair Value Calculation of Standard Essential Patents for Multi-Component Products, which outlines the following principles: Principle (1): The parties to a licensing agreement should be decided based on the concept of "license to all"; Principle (2): Royalty should be calculated using a "top-down" approach; and Principle (3): Royalty should be calculated based on the portion to which the SEP technology contributes (contribution rate) in the value of the main product that implements the SEP technology. Link to METI's Guide (English) https://www.meti.go.jp/policy/mono_info_service/mono/smart_mono/sep/200421sep_fairvalue_hp_eng.pdf
Q11	Would publication of decisions be an enabler of transparency or discourage use of the RDT?	The publication of decisions is a key enabler of transparency. To meet the FRAND terms, royalty rates should be uniform. A minimum requirement for satisfying these terms is the disclosure of the rates. Moreover, not only the final amount awarded, but also the reasoning and process by which the decision was reached should be made public. Finally, SME implementers should be permitted to request at the outset of the proceeding that their identity be redacted from the public record to prevent their participation in the rate determination from leading them to be singled out by SEP holders over their competitors. While it is important that all companies should be willing to pay FRAND royalties, a company that carries a significantly greater royalty burden than its competitors is placed at a material (and potentially existential) disadvantage.
Q12	What powers or procedural rules should be implemented to ensure the RDT operates effectively and facilitates accessible, quick and cost-effective rate determinations?	Requests can be submitted at any time, regardless of the stage of negotiation. Requests must be made by relevant parties, including rights holders, implementers, and prospective implementers. However, given the information asymmetries and potential risk of past liability, an implementer should be entitled to remove the proceeding to the High Court if an action is initiated against them by a rights holder. Additionally, individuals or entities with a legitimate interest in determining the royalty rate—such as suppliers responsible for patent guarantees—should also be eligible to file a request.

Q13	What powers and rules of procedures would be most useful to ensure the RDT can encourage its use by all parties in the SEP ecosystem?	Subject to the possibility of appeal, a key factor that would encourage use of the RDT would be that the decision has the same binding effect as a final Court judgment. The RDT must accept requests from all relevant parties, including rights holders, implementers, and prospective implementers. Additionally, entities with a legitimate interest in determining the royalty rate—such as suppliers responsible for patent guarantees—should also be eligible to file a request. Given the reduced procedural safeguards, there should be limitations regarding using the outcomes of these procedures as comparable in other proceedings. Unlike full judicial FRAND determinations or even most arbitration, the adjudicators here would be limited in their ability to engage with the facts and evidence of the particular patent. Because of this, the outcomes may not reliably reflect the economic value of the portfolio, making them inappropriate as a comparable in other cases.
Q14	In your view, would this proposal meet the government's aims of increasing transparency and reducing information asymmetry? Please explain why.	Yes JAMA welcomes the IPO's approach to ensuring transparency in connection with SEP licensing by requiring disclosure of pertinent information in a central SEP register and database and by specifying the requisite information in some detail.
Q15	How should the government provide legal certainty for users on what is in scope of this proposed mandatory requirement (e.g., specific provisions enshrined in law outlining when the requirement to provide information is triggered or what is excluded from the requirement)?	JAMA proposes that the scope should include standards issued prior to the enforcement of the regulation, and that it should be able to address current urgent issues related to FRAND licensing and enforcement. Major existing wireless communication standards such as 4G, 5G, and Wi-Fi will continue to be essential for business in many industrial sectors and IoT. These standards have also seen the most SEP litigations and licensing disputes over the past decades and have been the source of the greatest challenges regarding transparency and determination of FRAND terms. JAMA is concerned that excluding such major existing standards from the scope would result in the loss of beneficial effects precisely in the areas where they are most needed. JAMA suggests that, rather than limiting the application to SEPs for which the SEP holders have made a commitment to license on FRAND terms, the definition of "SEP holder" should be clarified to explicitly include all SEP holders, regardless of whether they are members of an SSO. JAMA is concerned that implementers may be placed in a vulnerable position. Specifically, this refers to rights

		holders such as PAEs (Patent Assertion Entities), who purchase patents from non-SSO members and may delay or refuse FRAND commitments for strategic or tactical reasons. Under the draft regulation, such SEP holders would not be required to comply with the procedures stipulated by the regulation before initiating litigation. To provide legal certainty for users, JAMA recommends that the government enshrine specific provisions in law that clearly define the scope of the mandatory requirement, including: A comprehensive list or clear criteria for which standards are included, covering both pre-existing and future standards; Explicit definitions of SEP holders to ensure all relevant parties are covered, regardless of SSO membership or FRAND commitments; Clear triggers for when the requirement to provide information is activated, and transparent exclusions, if any, to avoid ambiguity. This approach would ensure that all stakeholders have a clear understanding of their obligations and rights under the regulation, thereby providing the necessary legal certainty. Centralized management and operation of SEP information should be undertaken by a neutral and specialized third-party organization, such as the "Competence Centre" formerly proposed in the European Commission's "Regulation Proposal on SEPs (2023/0133 (COD))."
Q16	What standard related patents information should rightsholders be required to submit to the IPO to build a useful data set (e.g. technical specification or standard the patent relates to, FRAND commitment, availability of licences)?	The register should contain the following entries: (a) Information on the relevant standards to which the patent relates; (b) Identification details of the registered SEP, including the country of registration and the patent number; (c) The version of the standard, the technical specification, and the specific sections of the technical specification for which the patent is considered essential; (d) Reference to the terms of the SEP holder's FRAND licensing commitment to the standard development organisation; (e) Name, address, and contact details of the SEP holder; (f) Where the SEP holder is part of a group of companies, the name, address, and contact details of the parent company; (g) Where applicable, the name, address, and contact details of the SEP holder's legal representative in the UK;

		(h) The existence of any public standard terms and conditions, including the SEP holder's royalty and discount policies, and information regarding the licensed products and (groups of) potential licensees to whom those standard terms and policies apply (e.g., the relevant industry/sector and the application level within the value chain, such as OEM or Tier-N supplier); (i) The existence of any public standard terms and conditions for SEP licensing to SMEs; (j) Where applicable, the availability of licensing through patent pools; (k) Contact details for licensing, including the licensing entity; and (l) The date of registration of the SEP in the register and the registration number.
Q17	Are there alternative mechanisms or routes that might more easily achieve the government's objectives of increasing transparency and reducing information asymmetry?	Quality and Transparency of Essentiality Checks: JAMA is concerned that if essentiality checks, FRAND determinations, and expert opinions on aggregate royalties are of insufficient quality or are perceived as biased, the institutions and procedures established by the IPO's regulatory proposals will become an additional burden for the industry rather than a relief. This would undermine the entire purpose of the regulatory proposals. Essentiality Checks – Exclusion of Pool-Checked SEPs: JAMA firmly believes that SEPs checked by patent pools should not be exempted from the "Competence Centre's essentiality checks and scrutiny. Exempting these SEPs creates an inherent risk of unconscious bias in favour of finding essentiality. Transparency and Stakeholder Participation in FRAND Determination: JAMA believes that third parties with a legitimate interest in the outcome of the FRAND determination should be allowed to join the proceedings or, at the very least, be entitled to submit observations for consideration by the conciliator. Disclosure of Aggregate Royalty Methodology: Without specific information about the methodology used to determine the aggregate royalty and the underlying assumptions, it is impossible to ascertain whether the determination is accurate and FRAND-compliant.
Q18	What, if any, sanctions should the government consider introducing to deal with non-compliance issues	JAMA believes that in order to ensure the effectiveness and transparency of SEP regulations, it is important to introduce appropriate sanctions for non-compliance issues. However, in designing sanctions, the following points should be emphasized: 1. Publication of company names in lists

	(e.g. invalidity, enforceability, public listing of non-compliant patent owners, fines, administrative fees)?	Listing the names of SEP holders who have violated the regulations in official databases or public lists. However, in order to prevent misidentification or unjust listing, sufficient prior notice and opportunities for objection should be provided. 2. Administrative penalties (fines/fees) Imposing administrative fines or additional fees for malicious or repeated violations. The size of fines or fees should be set in stages according to the nature, frequency, and impact of the violation, whilst taking care not to impose excessive burdens. 3. Restrictions on the exercise of rights If the non-compliance issues are serious, the exercise of rights (such as injunctions or claims for damages) for the relevant SEP could be restricted for a certain period. However, restrictions on the exercise of rights should be carefully implemented, taking into account the balance with the legitimate rights of patent holders. 4. Invalidation/compulsory corrective measures In cases of extremely malicious conduct or false declarations, cancellation or invalidation of the relevant SEP registration, or compulsory corrective measures (e.g., compulsory FRAND declaration), could be imposed. 5. Procedural guarantees and fairness When applying sanctions, sufficient opportunities for both SEP holders and implementers to express their opinions and file objections should be ensured to guarantee procedural fairness. JAMA requests a balanced system design so that sanctions do not become excessively strict and hinder innovation or standardization activities. We also hope that sanctions will be implemented in a manner that contributes to the objectives of the SEP regulations, namely, the realization of a FRAND licensing environment and the promotion of sound market competition.
Q19	How should the IPO ensure information is supplied accurately by the rightsholder (e.g penalties, incentives such as reduced fees)?	JAMA believes that ensuring the accuracy and reliability of information related to SEPs is essential for streamlining and increasing the transparency of SEP license negotiations. In particular, considering the current situation where information asymmetry regarding the essential requirements of SEPs and FRAND conditions poses a significant practical barrier, we propose the following: 1. Centralized management and operation by neutral and specialized "competence centres," etc. Centralized management and operation of SEP information by a neutral and specialized third-party organization, such as the "Competence Centre" formerly proposed in the European Commission's "Regulation Proposal on SEPs (2023/0133 (COD))."

		Relying solely on self-declaration by SEP holders carries a high risk of incomplete information, arbitrary operation, or unintended errors, and in practice, disputes over the essentiality and validity of SEPs occur frequently. On the other hand, if an independent expert organization conducts examination, verification, and update management of registration information, the objectivity and accuracy of the information would be greatly improved, providing a reliable foundation for implementers. 2. Specific measures to ensure information accuracy (1) Clarification of submission obligations and monitoring of compliance Legally obligate rights holders to accurately submit and update standard-related patent information (patent number, standard name/version, presence or absence of FRAND commitment, license terms, etc.), and establish a system in which the "Competence Centre" regularly monitors and inspects compliance. (2) Acceptance of objections and correction requests by third parties Establish a system that allows implementers and other stakeholders to easily file objections or correction requests when errors or deficiencies in registration information are discovered, and develop a structure for prompt investigation and response. (3) Penalties and incentives Impose penalties such as temporary suspension of registration or fines for intentionally or grossly negligently providing false or inaccurate information, while granting incentives such as reduced registration fees to rights holders who provide accurate information and update it promptly. (4) Essentiality checks by experts Institutionalize sampling checks and, as necessary, third-party evaluations by independent experts regarding the essentiality of SEPs.
Q20	In your view, do the general pre-action protocols as laid out in the Civil Procedure Rules (Pre-Action Protocols – Civil Procedure Rules) encourage sufficient information exchange to reduce the need for litigation, including on SEP	Blank (JAMA will not answer this question.)

	pricing and essentiality?	
Q21	Are you aware of any instances where pre-action protocols are ineffective or not adhered to, either generally or specifically in SEP disputes?	Blank (JAMA will not answer this question.)
Q22	Do you think the introduction of a SEP specialist pre-action protocol would address information asymmetry on pricing and essentiality by providing clear expectations on information exchange at an early stage?	Yes. In the current SEP environment, the "essentiality data" and the "method for calculating the FRAND rate" are often not disclosed, which we believe leads to the opacity and asymmetry of SEP licensing. We expect that the introduction of a "SEP pre-action protocol", which would include the disclosure of this key information during the early stages of a dispute and would suspend a patent holder's ability to seek injunction, could help resolve these issues earlier in the negotiation process. Overall, this would make license negotiations more transparent and fairer.
Q23	In your view, what should be included in any specialist SEP pre-action protocols to facilitate early disclosure of significant SEP information (e.g. claim charts, standard and version, essentiality data, how the FRAND rate was arrived at)?	We believe it is important to disclose at least the "essentiality data" and the "method for calculating the FRAND rate". In addition, clearly disclosing whether the subject SEP (and corresponding standard, as well) is mandatory or optional would help facilitate negotiations.
Q24	Have you used commercial essentiality services? Yes / No	Blank (JAMA will not answer this question.)
Q25	If you have used commercial services to assess essentiality, what are your	Blank (JAMA will not answer this question.)

	views on: accessibility (e.g. cost)? accuracy and reliability? how you used the data (e.g. for licensing negotiations, or valuation of a portfolio)? whether the services provide value for money?	
Q26	Are you a provider of commercial services? Yes / No	No
Q27	If you are a service provider, can you provide details on: services / packages you provide? methodologies you use to determine essentiality, or probability of essentiality? what you charge for your services, and whether you offer discounts for smaller users?	Blank (JAMA will not answer this question.)

	how you ensure reliability of the data? your main clients (e.g. SEP holders/licensees/others)? what your services are used for (e.g. assessing the value of a whole portfolio, dispute resolution)?	
Q28	Do you think there is value in a government-led essentiality review mechanism at the IPO?	There is a certain value in establishing a government-led system for conducting essentiality assessments of SEPs. In order to enhance the transparency and predictability of SEP licensing, it is essential to ensure high-quality essentiality assessments by guaranteeing third-party involvement and neutrality. In particular, it is important for information regarding the essentiality of SEPs to be accurate and reliable, as this is crucial for determining FRAND terms and for the healthy development of the industry as a whole. On the other hand, conducting essentiality assessments requires securing sufficient resources and selecting neutral assessors with appropriate knowledge and experience. If the quality or neutrality of the assessments cannot be ensured, it may instead impose unnecessary burdens or cause confusion within the industry. Therefore, when building an assessment system, it is important to establish strict selection criteria and procedural safeguards. In conclusion, a government-led essentiality assessment mechanism has certain value in improving the reliability of SEP licensing and preventing disputes, provided that an appropriate operational system and the assurance of neutrality and transparency are in place. However, because even high-quality essentiality checks can be wrong, any essentiality checks should not be treated as prima facie evidence in litigation that any individual patent is actually essential and should not change the burden of proof in establishing essentiality and infringement.
Q29	How could the government provide value for money, so affordable essentiality assessments are available?	The government should ensure that essentiality assessments are conducted in a timely manner by qualified, experienced, and neutral assessors and arbitrators, through a rigorous and carefully managed selection process. This would enable the provision of cost-effective services and would make essentiality assessments available

		at affordable prices.
Q30	What do you anticipate the primary use of an IPO led essentiality checking service would be? Who would primarily make use of it and for what purpose?	[Primary Users] SEP holders They use the service to prove, through third-party evaluation, that their patents are truly essential to the standard, thereby enhancing credibility in license negotiations. Implementers (e.g., product manufacturers) They use the service to verify whether the presented SEPs are truly essential, helping them avoid excessive royalty demands or unnecessary license agreements. Suppliers to implementers In recent litigation cases, suppliers have increasingly faced legal risks related to SEPs. As a result, FRAND assessments and essentiality check results can influence pricing and contract terms across the entire supply chain, making suppliers potential users of the service. [Main Purposes of Use] Streamlining license negotiations Objective essentiality assessments clarify the starting point for negotiations and help prevent disputes. Reducing litigation risk Third-party evaluation results can be used as evidence in litigation, helping to mitigate legal risks and reduce evidentiary burdens. Promoting a healthy market Establishing a transparent evaluation system helps prevent SEP abuse and fosters a fair competitive environment.
Q31	What other options could you suggest to provide cost-effective essentiality assessments for SMEs and startups?	To provide cost-effective essentiality assessments for SMEs and startups, institutional flexibility and financial support are essential. First, establishing a system that allows all implementers—regardless of company size or market share—to participate in the assessment process would enable transparent access to information; Second, to reduce the financial burden of assessments, public subsidies and a tiered fee structure based on company size would be effective; and

		Furthermore, publishing assessment results and enhancing educational and support programs would help close the information gap and promote better understanding of the system. These efforts would create an environment where SMEs and startups can fairly utilize the SEP system, making essentiality assessments more cost-effective and accessible.
Q32	Does the current patent framework provide adequate remedies for SEP litigation?	Blank (JAMA will not answer this question.)
Q33	How can bad behaviours in licensing negotiations be addressed or prevented?	Blank (JAMA will not answer this question.)
Q34	Has the threat of injunctions ever played a part in your SEP negotiations? YES/NO	Blank (JAMA will not answer this question.)
Q35	If you believe the threat of injunctions had an impact on your SEP negotiations, please explain what that impact was, providing appropriate data and evidence.	Blank (JAMA will not answer this question.)
Q36	Could the other proposals presented by the government in this consultation help deal with 'bad faith' behaviours, including the threat of injunctions?	We believe this will be helpful. The current issue is that, amid the lack of transparency regarding essentiality data and FRAND rates, implementers face the threat of patentees seeking injunctions. Therefore, it is necessary to develop and improve protocols such as the SEP pre-action protocol to promote transparency, and speed, while also establishing rules to prevent SEP holders from using injunctions to circumvent or breach their FRAND commitments.
Q37	How aware are you of ADR services available to resolve SEP licensing disputes?	Blank (JAMA will not answer this question.)

	Fully aware Aware Neither aware nor not aware Some awareness Not aware Please explain your answer.	
Q38	Have you used ADR services to resolve a SEP disputes? Please explain your answer.	Blank (JAMA will not answer this question.)
Q39	What barriers, if any, have affected your ability to use ADR services to resolve a SEP dispute?	Blank (JAMA will not answer this question.)
Q40	Are you an ADR provider? If so, could you explain your experience of dealing with SEP disputes within your services. We are particularly interested in: how many SEP dispute referrals have you had? what are the types of issues parties with SEP disputes are seeking to resolve? where are the parties who are seeking your services based? what ADR services are parties involved in SEP disputes seeking (e.g.	Blank (JAMA will not answer this question.)

	mediation, arbitration)? what is the size of the businesses seeking your services to resolve their SEP dispute (e.g. micro (up to 9 employees, small (10–49 employees), medium (50–249 employees) and large (250 + employees))? what is the success rate of the resolution of the SEP disputes you’ve encountered?	
Q41	In your view, is there a need for the government to expand the IPO’s mediation services to support businesses to resolve their SEP disputes, or are existing ADR services adequate?	Blank (JAMA will not answer this question.)
Q42	Do you think these non-regulatory measures are the right ones?	The three non-regulatory measures are very useful, as they contribute to making license negotiations transparent and fair. We hope that the UK will continue to strengthen these measures in the future. However, we believe that these measures would benefit from some form of legal binding to better help promote dispute resolution, especially for small and medium-sized enterprises (provided that that the initiatives are subject to adequate procedural safeguards and are based on reliable methodology).
Q43	Do you think there is more government can do in its non-regulatory work?	With the EU withdrawing its proposed SEP regulations, we believe that the UK is currently leading the way in efforts toward transparency, and we are very grateful for this. We hope the UK will continue to develop rules that ensure fairness and transparency in SEP licensing and work together with other countries to make this a global trend.

Q44	Do you agree with the assumptions we have used in our assessment of the impacts? (Yes/No/Don't know) If not, please explain why you did not agree with the assessment	Don't know While we cannot determine whether the cost assumptions are accurate, we agree that the number of specific standards and patents is likely to decrease in the long term.
Q45	Are there any other significant costs or benefits that should be included? (Yes/No/Don't know) If yes, what are they?	However, the total number of standards may increase overall.
Q46	Are you aware of any data or other information that could help us to quantify: the potential cost savings to businesses using RDT rather than the courts? the potential time and other efficiency savings from using RDT rather than courts? the benefits of reducing barriers to market entry through publishing rates determined by the RDT? (Yes/No/Don't know) If yes, what are they?	[other data]: YES [cost saving]: Don't know [time and other efficiencies]: We do not yet know the actual potential time savings or other efficiency gains that RDT may offer. However, we believe that RDT has the potential to reduce the number of lawsuits and enable more effective use of resources for development. [benefits of publishing rates]: A minimum requirement for achieving this is the public disclosure of the rates. This enables implementers to visualize the required licensing fees, plan budgets, and assess risks. It also reduces the time and cost associated with negotiations and litigation. As a result, it promotes the development of products and services that incorporate standard technologies and fosters innovation. Furthermore, it reduces the time and cost for patent holders and allows them to collect royalties more broadly.
Q47	Please supply any other	Blank (JAMA will not answer this question.)

	information which you consider would be useful to help us assess the impacts of the options.	
--	--	--