DE/Germany

Survey on the Use of WIPO Standards

Publication numbers at our office are identical to application numbers.

WIPO Standard ST.1: Minimum data elements required to uniquely identify a patent document

1. Is the Standard implemented in your Office's/Organization's practice? (Please choose one of the options below)
✓ Completely
Partly
Not Implemented
2. If the answer was "Partly", please explain your Office's/Organization's practice briefly:
3. If the answer was "Not Implemented", does your Office/Organization plan to implement the Standard?
4. Comments (optional)
WIPO Standard ST.2: Manner for designating calendar dates
1. Is the Standard implemented in your Office's/Organization's practice? (Please choose one of the options below)
✓ Completely
Partly
Not Implemented
2. If the answer was "Partly", please explain your Office's/Organization's practice briefly:
3. If the answer was "Not Implemented", does your Office/Organization plan to implement the Standard?
4. Comments (optional)
WIPO Standard ST.3: Two-letter codes for the representation of states, other entities and organizations
1. Is the Standard implemented in your Office's/Organization's practice? (Please choose one of the options below)
✓ Completely
Partly
Not Implemented
2. If the answer was "Partly", please explain your Office's/Organization's practice briefly:
3. If the answer was "Not Implemented", does your Office/Organization plan to implement the Standard?
4. Comments (optional)
WIPO Standard ST.6: Numbering of published patent documents
1. Is the Standard implemented in your Office's/Organization's practice? (Please choose one of the options below)
✓ Completely
Partly
Not Implemented
2. If the answer was "Partly", please explain your Office's/Organization's practice briefly:
3. If the answer was "Not Implemented", does your Office/Organization plan to implement the Standard?
4. Comments (optional)

WIPO Standard ST.8: IPC symbols on machine-readable records
1. Is the Standard implemented in your Office's/Organization's practice? (Please choose one of the options below) Completely Partly Not Implemented
2. If the answer was "Partly", please explain your Office's/Organization's practice briefly:
3. If the answer was "Not Implemented", does your Office/Organization plan to implement the Standard?IPC related data is exchanged in XML, mostly ST.36, which foresees the provision of IPC information as structured XML elements.4. Comments (optional)
WIPO Standard ST.9: Bibliographic data on and relating to patents and SPCs 1. Is the Standard implemented in your Office's/Organization's practice? (Please choose one of the options below) Completely Partly Not Implemented
 If the answer was "Partly", please explain your Office's/Organization's practice briefly: If the answer was "Not Implemented", does your Office/Organization plan to implement the Standard? Comments (optional)
WIPO Standard ST.10: Published patent documents 1. Is the Standard implemented in your Office's/Organization's practice? (Please choose one of the options below) Completely Partly Not Implemented
2. If the answer was "Partly", please explain your Office's/Organization's practice briefly:
3. If the answer was "Not Implemented", does your Office/Organization plan to implement the Standard?4. Comments (optional)
WIPO Standard ST.10/A: Format of patent documents 1. Is the Standard implemented in your Office's/Organization's practice? (Please choose one of the options below) Completely Partly Not Implemented
2. If the answer was "Partly", please explain your Office's/Organization's practice briefly:
 3. If the answer was "Not Implemented", does your Office/Organization plan to implement the Standard? 4. Comments (optional) DPMA no longer publishes in paper. The PDFs are in A4 format and the margins in the document correspond to the margins required by t standard.
WIPO Standard ST.10/B: Layout of bibliographic data components

1. Is the Standard implemented in your Office's/Organization's practice? (Please choose one of the options below)

Completely

Partly
Not Implemented
2. If the answer was "Partly", please explain your Office's/Organization's practice briefly:
3. If the answer was "Not Implemented", does your Office/Organization plan to implement the Standard?
4. Comments (optional)
WIPO Standard ST.10/C: Presentation of bibliographic data components
1. Is the Standard implemented in your Office's/Organization's practice? (Please choose one of the options below)
Completely
Partly
Not Implemented
2. If the answer was "Partly", please explain your Office's/Organization's practice briefly:
Paragraph 4 recommends how to specify the classification information according to the International Classification for Industrial Designs. The example given is LOC (6) Cl. 8-05. In the electronic register, we specify the class (INID 51), i.e. 08-05, and additionally give information on the version in a separate (non INID) field.
Paragraph 12b: Our priority documents do not make use of the suggested preambles shown under paragraph 12b.
3. If the answer was "Not Implemented", does your Office/Organization plan to implement the Standard?
4. Comments (optional)
WIPO Standard ST.10/D: Physical characteristics of patent documents
1. Is the Standard implemented in your Office's/Organization's practice? (Please choose one of the options below)
Completely Partly
✓ Not Implemented
2. If the answer was "Partly", please explain your Office's/Organization's practice briefly:
3. If the answer was "Not Implemented", does your Office/Organization plan to implement the Standard?
No.We understand that the standard refers to paper publications. Our office no longer publishes in paper.
4. Comments (optional)
WIDO Chanderd CT 44. Minimum of indexes to be incerted in notant greater
WIPO Standard ST.11: Minimum of indexes to be inserted in patent gazettes
1. Is the Standard implemented in your Office's/Organization's practice? (Please choose one of the options below)
Completely Partly Not Implemented
2. If the answer was "Partly", please explain your Office's/Organization's practice briefly:
3. If the answer was "Not Implemented", does your Office/Organization plan to implement the Standard?
4. Comments (optional)
WIPO Standard ST.12: Preparation of abstracts of patent documents
1. Is the Standard implemented in your Office's/Organization's practice? (Please choose one of the options below)
CompletelyPartly✓

Not Implemented
2. If the answer was "Partly", please explain your Office's/Organization's practice briefly:
3. If the answer was "Not Implemented", does your Office/Organization plan to implement the Standard?
4. Comments (optional)
This standard is a kind of introduction to the series 12A, B, and C of standards. There is nothing to implement.
WIPO Standard ST.12/A: Abstracts of patent documents
1. Is the Standard implemented in your Office's/Organization's practice? (Please choose one of the options below)
Completely
Partly
Not Implemented
2. If the answer was "Partly", please explain your Office's/Organization's practice briefly:
Our legislation has slightly different regulations concerning the length of abstracts (less than 1500 characters which is about 225 words). Our regulations are not as specific concerning the content of the abstract.
3. If the answer was "Not Implemented", does your Office/Organization plan to implement the Standard?
4. Comments (optional)
WIPO Standard ST.12/B: Categorized patent abstract
1. Is the Standard implemented in your Office's/Organization's practice? (Please choose one of the options below)
Completely
Partly
✓ Not Implemented
2. If the answer was "Partly", please explain your Office's/Organization's practice briefly:
3. If the answer was "Not Implemented", does your Office/Organization plan to implement the Standard?
No. The legislation does not require categorized patent abstracts.
4. Comments (optional)
WIPO Standard ST.12/C: Physical characteristics of separately published abstracts
1. Is the Standard implemented in your Office's/Organization's practice? (Please choose one of the options below)
Completely
Partly
✓ Not Implemented
2. If the answer was "Partly", please explain your Office's/Organization's practice briefly:
3. If the answer was "Not Implemented", does your Office/Organization plan to implement the Standard?
No. The standard is not applicable to the practices at our office.
4. Comments (optional)
WIPO Standard ST.13: Numbering of applications for IPRs
1. Is the Standard implemented in your Office's/Organization's practice? (Please choose one of the options below)
Completely
✓ Partly
Not Implemented
2. If the answer was "Partly", please explain your Office's/Organization's practice briefly:

Paragraph 5a requires a fixed length of 15 characters, with nine for the serial number. Our numbers have a length of 12 characters, composed identically to the standard, but with only 6 digits for the serial number.

Paragraph 5b reserves a numeric region for type codes of utility model related applications to 22-29. Our type code for topographies, which do not belong to utility models, is 22 instead of in the 30-89 region.

Paragraph 5d preferably requires a serial number of 9 digits. Ours has 6 digits. Furthermore, the control digit is not part of our serial number (nor of the application number), but separated by a '.' after the serial number.

- 3. If the answer was "Not Implemented", does your Office/Organization plan to implement the Standard?
- 4. Comments (optional)

The standard came into force only a few years after all systems had been adapted to our new application numbering code. An additional change to our codes, in order to become completely compliant with the standard, would result in an enormous effort. As we do not consider the deviance from the standard as crucial for understanding our application numbers, no changes to our application numbers are planned for the near or mid

WIPO Standard \$1.14: References cited in patent documents
1. Is the Standard implemented in your Office's/Organization's practice? (Please choose one of the options below)
Completely
✓ Partly
☐ Not Implemented
2. If the answer was "Partly", please explain your Office's/Organization's practice briefly:
DPMA has internal directives on how citations are to be performed. For most parts, this directive is in line with ST.14. Small deviations exists according to national practice, e.g. the category "&" is not used, or for documents produced by a Standards Defining Organization the order of the information provided is different (standard identifier and number assigned are in first place and not the author).
3. If the answer was "Not Implemented", does your Office/Organization plan to implement the Standard?
4. Comments (optional)
WIPO Standard ST.15: Titles of inventions in patent documents
1. Is the Standard implemented in your Office's/Organization's practice? (Please choose one of the options below)
Completely
✓ Partly
Not Implemented
2. If the answer was "Partly", please explain your Office's/Organization's practice briefly:
The regulations concerning the title are not quite as concise as the requirements in the standard.
3. If the answer was "Not Implemented", does your Office/Organization plan to implement the Standard?
4. Comments (optional)
WIPO Standard ST.16: Identification of different kinds of patent documents
1. Is the Standard implemented in your Office's/Organization's practice? (Please choose one of the options below)
✓ Completely
Partly

- 2. If the answer was "Partly", please explain your Office's/Organization's practice briefly:
- 3. If the answer was "Not Implemented", does your Office/Organization plan to implement the Standard?
- 4. Comments (optional)

Not Implemented

WIPO Standard ST.17: Coding of headings of announcements made in official gazettes

1. Is the Standard implemented in your Office's/Organization's practice? (Please choose one of the options below)

Completely
Partly
✓ Not Implemented
2. If the answer was "Partly", please explain your Office's/Organization's practice briefly:
3. If the answer was "Not Implemented", does your Office/Organization plan to implement the Standard?
No: WIPO Standard ST.17 was discussed intensively at DPMA after its adoption, both internally and with users of IP information. These discussions did not show significant support for applying that standard to gazettes in Germany
4. Comments (optional)
WIPO Standard ST.18: Patent gazettes and other patent announcement journals
1. Is the Standard implemented in your Office's/Organization's practice? (Please choose one of the options below)
Completely
✓ Partly
Not Implemented
2. If the answer was "Partly", please explain your Office's/Organization's practice briefly:
Paragraphs 8d/8e and the paragraph after 8e require that a statement should be given on the outside front cover of the Patent Gazette if the numbers do not constitute a coherent, complete set. Numbers at DPMA do not constitute a coherent, complete set, but we do not give such a statement on the outside cover.
Furthermore, the standard recommends following ST.17, which we do not do.
3. If the answer was "Not Implemented", does your Office/Organization plan to implement the Standard?
4. Comments (optional)
WIPO Standard ST.19: Indexes issued by IPO
1. Is the Standard implemented in your Office's/Organization's practice? (Please choose one of the options below)
Completely
Partly
✓ Not Implemented
2. If the answer was "Partly", please explain your Office's/Organization's practice briefly:
3. If the answer was "Not Implemented", does your Office/Organization plan to implement the Standard?
No
DPMA discontinued the publication of quarterly and yearly indexes more than 10 years ago. We consider them to be unnecessary due to the possibilities of electronic search, for instance via our register:
https://register.dpma.de/DPMAregister/uebersicht?lang=en
4. Comments (optional)
WIPO Standard ST.20: Name indexes to patent documents
1. Is the Standard implemented in your Office's/Organization's practice? (Please choose one of the options below)
Completely
✓ Partly
Not Implemented
2. If the answer was "Partly", please explain your Office's/Organization's practice briefly:
Our Patent Gazette includes a name index, which on the whole matches the requirements of ST.20. Regarding the preface containing rules followed in creating and presenting the name index, our gazette is perhaps not as comprehensive as it could be.
3. If the answer was "Not Implemented", does your Office/Organization plan to implement the Standard?

4. Comments (optional)

WIPO Standard ST.21: Reduction of volume of priority documents
1. Is the Standard implemented in your Office's/Organization's practice? (Please choose one of the options below)
CompletelyPartly✓ Not Implemented
2. If the answer was "Partly", please explain your Office's/Organization's practice briefly:
3. If the answer was "Not Implemented", does your Office/Organization plan to implement the Standard?
No.
We do not consider this standard to be applicable to our practice. In particular, the microfiche alternative seems outdated. We are currently checking alternatives like WIPO DAS for electronically exchanging priority documents.
4. Comments (optional)
WIPO Standard ST.22: Authoring of patent applications for the purpose of OCR
1. Is the Standard implemented in your Office's/Organization's practice? (Please choose one of the options below)
Completely
✓ Partly
Not Implemented
2. If the answer was "Partly", please explain your Office's/Organization's practice briefly:
Our laws and regulations contain some of the provisions of the standard, many, however, are missing. For example, we do not have requirements concerning
white and clean paper (10a) paper weight (10b) prohibition of rolling (10d) prohibition of absorbent paper (10e) placement of reference (13) specification of the part by the first word (16) surrounding of tables etc. with white space (23) hand written is allowed in some cases (26) spacing between paragraphs, base alignment for characters (28,29) tables (32, 33) fonts (36) unusual characters (40) mixing languages (42)
So far, setting up and enforcing such requirements were not necessary, as we do not heavily rely on the information gained through OCR.
3. If the answer was "Not Implemented", does your Office/Organization plan to implement the Standard?
4. Comments (optional)

WIPO Standard ST.25: Presentation of nucleotide and amino acid sequence listings

CompletelyPartlyNot Implemented

1. Is the Standard implemented in your Office's/Organization's practice? (Please choose one of the options below)

- 2. If the answer was "Partly", please explain your Office's/Organization's practice briefly:
- 3. If the answer was "Not Implemented", does your Office/Organization plan to implement the Standard?
- 4. Comments (optional)

AIVIL
1. Is the Standard implemented in your Office's/Organization's practice? (Please choose one of the options below)
Completely
Partly
✓ Not Implemented
2. If the answer was "Partly", please explain your Office's/Organization's practice briefly:
3. If the answer was "Not Implemented", does your Office/Organization plan to implement the Standard?
Yes:
As suggested in the editorial note, we are waiting with the implementation until the task force decides on the transition procedure in connectic with the PCT.
No. If so, why not?
4. Comments (optional)
WIPO Standard ST.27: Recommendation for the Exchange of Patent Legal Status Data
1. Is the Standard implemented in your Office's/Organization's practice? (Please choose one of the options below)
Completely
Partly
Not Implemented
2. If the answer was "Partly", please explain your Office's/Organization's practice briefly:
The national register DPMAregister provides key events, as well as a graphical representation according to the Patent Prosecution Model. The provision of detailed events, as well as XML data is under development.
3. If the answer was "Not Implemented", does your Office/Organization plan to implement the Standard?
4. Comments (optional)
WIPO Standard ST.31: Character sets for the exchange of patent documents
1. Is the Standard implemented in your Office's/Organization's practice? (Please choose one of the options below)
Completely
Partly
✓ Not Implemented
2. If the answer was "Partly", please explain your Office's/Organization's practice briefly:
3. If the answer was "Not Implemented", does your Office/Organization plan to implement the Standard?
No: We consider the standard as technically outdated.
4. Comments (optional)
WIPO Standard ST.32: Markup of patent documents using SGML
1. Is the Standard implemented in your Office's/Organization's practice? (Please choose one of the options below)
Completely
Partly
✓ Not Implemented
2. If the answer was "Partly", please explain your Office's/Organization's practice briefly:

3. If the answer was "Not Implemented", does your Office/Organization plan to implement the Standard?

WIPO Standard ST.26: Presentation of nucleotide and amino acid sequence listings using

4. Comments (optional)
WIPO Standard ST.33: Data exchange of facsimile information of patent documents
 1. Is the Standard implemented in your Office's/Organization's practice? (Please choose one of the options below) Completely Partly Not Implemented
2. If the answer was "Partly", please explain your Office's/Organization's practice briefly:
3. If the answer was "Not Implemented", does your Office/Organization plan to implement the Standard?No: We consider the standard as technically outdated.4. Comments (optional)
WIPO Standard ST.34: Recording of application numbers in electronic form
 1. Is the Standard implemented in your Office's/Organization's practice? (Please choose one of the options below) Completely Partly Not Implemented
2. If the answer was "Partly", please explain your Office's/Organization's practice briefly:
3. If the answer was "Not Implemented", does your Office/Organization plan to implement the Standard?No. The editorial note recommends that if we implement ST.13 (which we are nearly compliant with), ST.34 should not be used.4. Comments (optional)
WIPO Standard ST.35: Data exchange of mixed-mode published patent information on MMMT
 Is the Standard implemented in your Office's/Organization's practice? (Please choose one of the options below) Completely Partly Not Implemented If the answer was "Partly", please explain your Office's/Organization's practice briefly:
3. If the answer was "Not Implemented", does your Office/Organization plan to implement the Standard?No: We consider the standard as technically outdated.4. Comments (optional)
WIPO Standard ST.36: Processing of patent information using XML
1. Is the Standard implemented in your Office's/Organization's practice? (Please choose one of the options below) Completely Partly Not Implemented
2. If the answer was "Partly", please explain your Office's/Organization's practice briefly:

3. If the answer was "Not Implemented", does your Office/Organization plan to implement the Standard?

4. Comments (optional)

No: We consider the standard as technically outdated.

WIPO Standard ST.37: Recommendation for an Authority File of Published Patent Documents

1. Is the Standard implemented in your Office's/Organization's practice? (Please choose one of the options below)
✓ Completely
Partly
Not Implemented
2. If the answer was "Partly", please explain your Office's/Organization's practice briefly:
3. If the answer was "Not Implemented", does your Office/Organization plan to implement the Standard?
4. Comments (optional)
WIPO Standard ST.40: Facsimile images of patent documents available on CD-RON
1. Is the Standard implemented in your Office's/Organization's practice? (Please choose one of the options below)
Completely
Partly
✓ Not Implemented
2. If the answer was "Partly", please explain your Office's/Organization's practice briefly:
3. If the answer was "Not Implemented", does your Office/Organization plan to implement the Standard?
No: This standard is not applicable to our practice because we publish PDFs as text, not as facsimile/image data.
4. Comments (optional)
WIPO Standard ST.50: Corrections, alterations and supplements relating to patent information
1. Is the Standard implemented in your Office's/Organization's practice? (Please choose one of the options below)
✓ Completely
Partly
Not Implemented
2. If the answer was "Partly", please explain your Office's/Organization's practice briefly:
3. If the answer was "Not Implemented", does your Office/Organization plan to implement the Standard?
4. Comments (optional)
WIPO Standard ST.60: Bibliographic data relating to marks
1. Is the Standard implemented in your Office's/Organization's practice? (Please choose one of the options below)
✓ Completely
Partly
Not Implemented
2. If the answer was "Partly", please explain your Office's/Organization's practice briefly:
3. If the answer was "Not Implemented", does your Office/Organization plan to implement the Standard?
4. Comments (optional)
WIPO Standard ST.62: Standard abbreviation for "Vienna Classification"

1. Is the Standard implemented in your Office's/Organization's practice? (Please choose one of the options below)

	Completely
	Partly
~	Not Implemented
2. If the	answer was "Partly", please explain your Office's/Organization's practice briefly:
3. If the	answer was "Not Implemented", does your Office/Organization plan to implement the Standard?
No: The	information concerning the Vienna Classification is clearly indicated in our electronic register - textually and using the appropriate INID 31).
4. Com	ments (optional)
WIPO	O Standard ST.63: Content and layout of trademark gazettes
1. Is the	e Standard implemented in your Office's/Organization's practice? (Please choose one of the options below)
	Completely
~	Partly
	Not Implemented
2. If the	answer was "Partly", please explain your Office's/Organization's practice briefly:
not cons	ph 6(iv) and the paragraph after 6(v) require that a statement should be given on the outside front cover of the Gazette if the numbers destitute a coherent, complete set. Numbers at DPMA do not constitute a coherent, complete set, but we do not give such a statement on ide cover.
3. If the	answer was "Not Implemented", does your Office/Organization plan to implement the Standard?
4. Com	ments (optional)
WIPO	O Standard ST.64: Search files for trademark search
1. Is the	e Standard implemented in your Office's/Organization's practice? (Please choose one of the options below)
~	Completely
	Partly
	Not Implemented
2. If the	answer was "Partly", please explain your Office's/Organization's practice briefly:
3. If the	answer was "Not Implemented", does your Office/Organization plan to implement the Standard?
4. Com	ments (optional)
At the ti	me this standard was written, such data existed only on paper file and CD-ROM. Assuming that this standard can be applied to a moder comment, we are fully conform.
WIPO	O Standard ST.66: Processing of trademark information using XML
1. Is the	e Standard implemented in your Office's/Organization's practice? (Please choose one of the options below)
~	Completely
	Partly
	Not Implemented
2. If the	answer was "Partly", please explain your Office's/Organization's practice briefly:
3. If the	answer was "Not Implemented", does your Office/Organization plan to implement the Standard?
4. Com	ments (optional)
WIPO	O Standard ST.67: Electronic management of the figurative elements of trademarks
1. Is the	e Standard implemented in your Office's/Organization's practice? (Please choose one of the options below)
	Completely
✓	Partly
_	

Not Implemented
2. If the answer was "Partly", please explain your Office's/Organization's practice briefly:
The regulations differ slightly regarding the recommendations for image format and size:
Our require maximal (1890x1890) and minimal (945x945) pixel sizes.
The allowances for images sizes are minimum 8cmx8cm, maximum 26,2cmx17cm. These differ slightly from the recommendations of the standard.
With these allowances (pixels and sizes), the resulting resolutions lie roughly within the range recommended in the standard.
For color images, our regulations do not require an ICC profile.
3. If the answer was "Not Implemented", does your Office/Organization plan to implement the Standard?
4. Comments (optional)
WIPO Standard ST.68: Electronic management of sound marks
1. Is the Standard implemented in your Office's/Organization's practice? (Please choose one of the options below)
CompletelyPartlyNot Implemented
2. If the answer was "Partly", please explain your Office's/Organization's practice briefly:
3. If the answer was "Not Implemented", does your Office/Organization plan to implement the Standard?4. Comments (optional)
WIPO Standard ST.80: Bibliographic data relating to industrial designs
1. Is the Standard implemented in your Office's/Organization's practice? (Please choose one of the options below)
Completely Partly
☐ Not Implemented
2. If the answer was "Partly", please explain your Office's/Organization's practice briefly:
3. If the answer was "Not Implemented", does your Office/Organization plan to implement the Standard?
4. Comments (optional)
WIPO Standard ST.81: Content and layout of industrial designs gazettes
1. Is the Standard implemented in your Office's/Organization's practice? (Please choose one of the options below)
Completely
Partly
☐ Not Implemented
2. If the answer was "Partly", please explain your Office's/Organization's practice briefly:
Paragraph 6(d) and the paragraph after 6(e) require that a statement should be given on the outside front cover of the Gazette if the numbers of not constitute a coherent, complete set. Numbers at DPMA do not constitute a coherent, complete set, but we do not give such a statement on the outside cover.
The gazette does not have indications on the subject matter given as recommended in paragraph 19.
3. If the answer was "Not Implemented", does your Office/Organization plan to implement the Standard?
4. Comments (optional)

1. Is the Standard implemented in your Office's/Organization's practice? (Please choose one of the options below)

WIPO Standard ST.86: Processing of industrial design information using XML

☐ Completely
Partly
✓ Not Implemented
2. If the answer was "Partly", please explain your Office's/Organization's practice briefly:
3. If the answer was "Not Implemented", does your Office/Organization plan to implement the Standard?
Yes, in the near future.
4. Comments (optional)
WIPO Standard ST.87: The exchange of industrial design legal status data
1. Is the Standard implemented in your Office's/Organization's practice? (Please choose one of the options below)
Completely
Partly
Not Implemented
2. If the answer was "Partly", please explain your Office's/Organization's practice briefly:
3. If the answer was "Not Implemented", does your Office/Organization plan to implement the Standard?
4. Comments (optional)
WIPO Standard ST.96: Processing of Industrial Property information using XML
1. Is the Standard implemented in your Office's/Organization's practice? (Please choose one of the options below)
Completely
Partly
✓ Not Implemented
2. If the answer was "Partly", please explain your Office's/Organization's practice briefly:

3. If the answer was "Not Implemented", does your Office/Organization plan to implement the Standard?

The decision regarding whether we will implement the standard, and if so when we will do so, has not been made yet. If the standard continues to gain acceptance by other offices, we might also follow it. A possible option would be to supply data from our register (perhaps additionally) in ST. 96. However, there is a strong dependence of third parties downloading our data, which we would need to respect.

4. Comments (optional)