

A Review Of A Decade Of Limitation And Revocation Procedures At The EPO¹

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Abstract:

The limitation and revocation procedures were introduced, by Article 105a-c EPC, at the European Patent Office (EPO) with the revision of the European Patent Convention (EPC), which entered into force on 13 December 2007.

In the history of the European Patent Office, the limitation and revocation procedures are the only new procedures introduced since the founding. They offer an additional possibility to patent proprietors to centrally limit or revoke their patents, without having to enter the corresponding national procedures.

After more than a decade from their entry into force, this article will address the main procedural aspects of both procedures, providing practitioners better chances of success. This article will also shed light on statistical data relating to both procedures.

For more details, refer to the EPC and to the Guidelines for Examination in the European Patent Office, Part D-X.

1. Information Common To Limitation And Revocation Procedures

The limitation and revocation procedures are new procedures introduced at the EPO by the revision of the EPC, with the Act of 29 November 2000 (hereinafter referred to as the EPC2000). The EPC2000 entered into force on 13 December 2007.

The limitation and revocation procedures are post-grant procedures, handled centrally by the EPO. They are defined by Article 105a-c EPC and the relevant rules in the implementing regulations (Rules 90 to 96 EPC).

Any time after grant the *ex parte* procedure can be initiated by the proprietor of a patent. It should be differentiated from the opposition procedure, which is an interpartes procedure. The procedure is carried out by the examining division (Rule 91 EPC), with some tasks entrusted to formalities officers (OJ EPO 2014, A6 and OJ EPO 2015, A104).

A decision by the EPO to limit or revoke a patent at the request of the proprietor results in the patent

being limited or revoked *ab initio* (i.e., *ex tunc* effect).²

The reasons underlying the introduction of the limitation and revocation procedures with the EPC2000, are linked to the decision of the Enlarged Board of Appeal G9/93 of 6 June 1994. In a nutshell, the Enlarged Board of Appeal (EBoA) decided that “a European patent cannot be opposed by its own proprietor” (so called “self-opposition”) and thus overturned the previous ruling of G1/84. At the core of the decision lies the wording of Article 99(1) EPC: “Within nine months of the publication of the mention of the grant of the European patent in the *European Patent Bulletin*, any person may give notice to the European Patent Office of opposition to that patent, in accordance with the Implementing Regulations. Notice of opposition shall not be deemed to have been filed until the opposition fee has been paid.”

The EBoA interpreted the wording “any person” in Article 99(1) EPC as meaning the public, but not the patent proprietor. The EBoA further argued that the legislator should cure possible problems arising from the proprietor being able to limit its own patent only at the national level and no longer at a central level.³

After this decision, the EPO, in cooperation with relevant stakeholders, studied whether a central limitation and revocation procedure at the EPO would be relevant and under which framework this could be possible. This collaborative work resulted in the introduction of the central limitation and revocation procedures with the EPC2000.⁴

The reasons for a proprietor to centrally limit or even revoke its own patent, *ab initio*, are multifaceted.

It could result from pending and parallel nullity and infringement national proceedings, bringing for exam-

1. This article is based on a presentation done at Examination Matters 2019 in May 2019 at the European Patent Office by the author. The author thanks Giovanni Arca, European Patent Academy, for his support and valuable inputs.

2. Articles 105b(3) and 68 EPC.

3. See decision G9/93, reasons 4.1.

4. See the 2000 Diplomatic Conference proceedings, MR/24/00, p.83ff and CA/PL 29/99 Rev.1, “Revision of the EPC: limitation procedure (Articles 105a-c, 68EPC),” dated 9 March 2000, available at <https://www.epo.org/law-practice/legal-texts/epc/archive/documentation/travaux-preparatoires/dc-documents.html>.

*The opinions expressed in the present article represent the author's personal opinion. They do not necessarily reflect the policy of the European Patent Office, nor can they be attributed to, or bind, the European Patent Office in any way.

ple to the attention of the proprietor a prior art, which was not known during the examination proceedings. In that case, it may be cheaper and quicker for the patent proprietor to limit its patent centrally at the EPO rather than in each national jurisdiction of interest.⁵

It could also result from an agreement reached with a competitor, in order to avoid costly litigation or it may be the consequence of mediation. It could also emanate from an arbitration award resulting in the obligation for the proprietor to limit or revoke its patent.⁶

It should however be noted that the reasons underlying a limitation or revocation request are not required by the EPO.⁷

2. The Limitation Procedure

2.1 Formal Requirements

The formal requirements for a limitation request are set out in Rules 92-93 EPC. Failure to satisfy them results in the request being deemed either as not filed or as not admissible and the distinction affects whether the limitation fee is refunded.⁸

Requesters may use Form 2380 provided by the EPO and containing information on the formal aspects to be fulfilled.⁹ It is thus preferable to use this form in order to ensure that all formal requirements are met.

One important formal aspect is the proof of ownership. Article 105a EPC stipulates that the proprietor may limit its patent. However, the EPO does not update the European Patent Register¹⁰ after grant. As

a consequence, it may happen that the owner of a patent and requester of a limitation is not the same as the one listed in the EP register. Should there be a discrepancy between the requester and the owner of the patent in the EP register, the requester should provide proofs that he is entitled to file the limitation request—*i.e.*, that he is the owner of the patent at stake. Such proof may be a recent excerpt from the relevant national patent register or any other valid means of evidence.

If the requester is not the patent proprietor for all the contracting states, the requester provides the names and addresses of the other patent proprietors, along with evidence that he is entitled to act on their behalf.¹¹

2.2 Substantive Requirements

According to Rule 95(2) EPC, if a request for limitation is admissible, the Examining Division shall examine whether the amended claims constitute a limitation *vis-à-vis* the claims as granted or amended in opposition or limitation proceedings.

The term “limitation” is to be interpreted as meaning a reduction in the extent of protection conferred by the claims. Mere clarifications or changes made to protect a different subject are not to be considered as limitations.

The limitation of a dependent claim only is allowable, but adding dependent claims is not permissible if not directly caused by the limitation introduced in the claims.

The claims of a limitation request should fulfil the requirements of Article 84, 123(2) and 123(3) EPC. There is no examination of other substantial requirements, meaning that no further search will be performed, and there is no examination of novelty and/or inventive step, for example.

One Opportunity to Amend

An important aspect of the limitation procedure is enshrined in Rule 95(2) EPC: “If the request does not comply with these requirements, the Examining Division shall give the requester one opportunity to correct any deficiencies noted, and to amend the claims and, where appropriate, the description and drawings, within a period to be specified.”

5. See *e.g.* CA/PL 29/99, part II.5-7, “Revision of the EPC: limitation procedure”, dated 8 November 1999, available at <https://www.epo.org/law-practice/legal-texts/epc/archive/documentation/travaux-preparatoires/plc-documents.html>.

6. In most jurisdictions, a patent cannot be limited or revoked *erga omnes* in an arbitration award. However, an arbitral award may declare that the proprietor shall limit or revoke his patent at the relevant national authority.

See for example Cook T & Garcia A, “International Intellectual Property Arbitration” (2010) Wolters Kluwer at 51 and 62-76; International Chamber of Commerce, “The ICC Intellectual Property Roadmap—13th Edition 2017” (2017) International Chamber of Commerce, available at <https://cdn.iccwbo.org/content/uploads/sites/3/2014/11/icc-IProadmap-intellectual-property-roadmap-current-emerging-issues-business-policymakers.pdf> at 66; see also the Agreement on a Unified Patent Court, Article 35(2) and Rule 11(2) of the Rules of Procedure of the Unified Patent Court.

7. This differs from some national jurisdictions, such as Great Britain or Germany, where the reasons for a limitation or a revocation request by the proprietor need to be explained. See *e.g.* the EPO e-learning on patent litigation A to Z, available at <https://e-courses.epo.org/course/view.php?id=57>.

8. See the Guidelines for Examination in the European Patent Office, Part D-X, 2.

9. <https://www.epo.org/applying/forms/forms.html>.

10. <https://www.epo.org/searching-for-patents/legal/register.html>.

11. Rule 92(2)(b) EPC; see the Guidelines for Examination in the European Patent Office, Part D-X, 2.2.

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The condition set in Rule 95(2) EPC providing the requester with only one opportunity to correct any deficiencies is important to note, because if such an opportunity is already exercised, no further amendment may be submitted, even during oral proceedings. The goal of the legislators with this requirement was to provide a procedure that is quick and efficient.¹²

As a consequence, it is crucial to consider the following aspects in order to maximise the chances of success of a limitation request.

First, it should be noted that auxiliary requests may be filed in limitation proceedings.¹³ As a consequence, and in view of the “one opportunity” requirement, a proprietor may consider, if appropriate in the particular circumstances of the case, filing auxiliary requests with the first reply to a negative communication of the examining division.

A proprietor may also consider, if appropriate in the particular circumstances of the case, telephoning the first examiner in charge of the limitation request, when a negative communication is received. Such a telephone conversation¹⁴ may indeed help the requester to better understand the objections of the examining division and thus may help him or her to better draft a reply and/or amended claims.

In addition, it is worth noting that the right to be heard (Article 113(1) EPC) should be respected, and requests for oral proceedings must be granted (Article 116 EPC). As a consequence, a request for limitation may not be refused based on objections which have not been raised beforehand and an opportunity to correct these deficiencies must be granted. However, the Guidelines for Examination in the EPO state that, in that particular case, “normally, no further amendments may be made in reply to that communication.”¹⁵ This would mean that the requester may be able to counter-argue the objections of the examining division but will not normally be able to make amendments. The scope of “normally” however is not defined, so that there may be cases in which amendments will be allowed to correct the deficiencies.

Notably, the description must also be amended accordingly, and the examining division cannot amend

the submissions of the requester on its own. Indeed, the situation is different from an intention to grant (Rule 71(3) EPC), in which the applicant has the opportunity to disagree with the text proposed for grant (Rule 71(6) EPC). On the contrary, once the requester has received the communication under Rule 95(3) EPC, he can only pay the fee and file the translations or have his request rejected for failure to do so. Therefore the examining division may not, with the communication under Rule 95(3) EPC, make amendments of its own motion to the claims or adapt the description of its own motion. The provisions of Article 113 EPC would not be met, since the requester would not have an opportunity to contest or comment on the amendments made.

Finally, as a workaround if the above does not lead to an allowable request, in particular because of the requirement imposing only one opportunity to correct deficiencies, it is worth noting that the number of limitation requests is not limited. This means that one may file a new limitation request if a previous limitation request has been rejected.¹⁶ One will thus get a new opportunity to correct deficiencies, however, at the cost of the fees for a new limitation request.

Relation to Opposition Proceedings

Opposition proceedings take precedence over the limitation procedure.¹⁷ This means that if a limitation request is filed while opposition proceedings are pending, the limitation request will be deemed as not filed and the limitation fee (if paid) will be reimbursed. If an opposition is duly filed after a limitation request has been started but has not yet ended, the limitation proceedings will end, and the opposition proceedings will continue. The legislators specified that “since validly initiated opposition proceedings already afford patent proprietors the opportunity for “self-limitation” or revocation, there is no justifiable need in such case for a concurrent limitation procedure.”¹⁸

Third-Party Observations

During limitation proceedings, third-party observation, under Article 115 EPC, may be filed.¹⁹

Even though the limitation procedure is an *ex parte*

12. See e.g. CA/PL 29/99, part II, 10, “Revision of the EPC: limitation procedure”, dated 8 November 1999, available at <https://www.epo.org/law-practice/legal-texts/epc/archive/documentation/travaux-preparatoires/plc-documents.html>.

13. See the Guidelines for Examination in the European Patent Office, Part D-X, 4.3.

14. See the Guidelines for Examination in the European Patent Office, Part C-VII, 2.1.

15. See the Guidelines for Examination in the European Patent Office, Part D-X, 4.4.

16. See the Guidelines for Examination in the European Patent Office, Part D-X, 11.

17. See the Guidelines for Examination in the European Patent Office, Part D-X, 7.

18. See CA/PL 29/99 Rev.1, part III, B.7, “Revision of the EPC: limitation procedure (Articles 105a-c, 68EPC),” dated 9 March 2000, available at <https://www.epo.org/law-practice/legal-texts/epc/archive/documentation/travaux-preparatoires/dc-documents.html>.

19. See the Guidelines for Examination in the European Patent Office, Part D-X, 4.5.

procedure, the possibility to file third-party observations may be of particular interest.

Indeed, as previously mentioned, a patent proprietor often files a limitation because of infringement and nullity actions in one or several national jurisdictions. Filing third-party observations could thus be an opportunity for an alleged infringer to influence the outcome of the central limitation at the EPO. In the case in which a patent owner amends the claims such that the patent would remain valid, and infringement would still occur, an alleged infringer could raise clarity or Article 123(2) / (3) EPC objections.²⁰ In that case, the examining division would take into account such observations before deciding on the limitation request.

Different Sets Of Claims

According to the Guidelines for Examination in the EPO, Part D-X, 10, “Art. 105b(3) specifies that the decision to limit or revoke will apply to the patent in all contracting states for which it has been granted. There is thus a single decision, covering all contracting states, but this decision may include different sets of claims for different contracting states, or determine that the limitation is in other ways different for different contracting states. Such situations could arise in two different sets of circumstances:

- Limitation results in the claims becoming different in different contracting states.
- Limitation is different for different contracting states because the claims as granted were different for different contracting states.”

In the first case, in which the limitation results in the claims becoming different in different contracting states, the requester informs the EPO of the reasons underlying this specific circumstance. This means that the requester must inform the EPO of the existence of national prior rights, which justify different sets of claims for different contracting states.²¹ If the requester fails to inform the EPO of the national prior rights, then the request is to be refused under Art. 105b(3) and Rule 138 EPC.

Final Steps

When a limitation request is considered allowable (*i.e.*, all requirements are met), the requester is invited, according to Rule 95(3) EPC, to pay the fee for printing of a new specification of the European patent and to file within three months a translation of the

20. One may refer to patent EP0522772, wherein a third-party observation was filed for this purpose (filed on 08 March 2017).

21. One may refer to patent EP0370625, wherein the limitation request contains sets of claims different for different contracting states (see the limitation request of 13 December 2007).

amended claims into the other two official languages.²² The patent, in its limited form, will be published in the European patent bulletin with the kind code B3.²³

It is important to note that translation may be needed for the limitation to take effect in a particular jurisdiction, in accordance with Article 65 EPC and the relevant national law.²⁴

If the limitation request is rejected as inadmissible or not allowable, a decision of the examining division to reject the limitation request is issued. This decision is appealable within two months (Rule 95(4) EPC).

2.3 Searching Limited Patents

Patents limited via the limitation procedure at the EPO can be identified easily as they are published with kind code B3. One can therefore look for such patents using the advanced search capability of Espacenet,²⁵ typing into the “publication number” field, the search term “EP B3.” This query will retrieve all European patents successfully limited under Article 105a-c EPC.

The European Patent Bulletin Search,²⁶ offering free expert access to the bibliographic and procedural information on European patent applications and granted patents, can also provide further search criteria.

For example, the query “LIMP=*” will retrieve all limitation requests, including limitation requests which were not successful. The query “LIMP=2018*” will retrieve all limitation requests made in 2018. The query “LIMR=*” will retrieve all limitation requests, in which the limitation of the patent was rejected (for any reason) and the query “LIMA=*” will retrieve all limitation requests, in which the limitation of the patent was allowed.²⁷

In the result tab of the EP Bulletin Search, it is possible to access the European patent register,²⁸ giving access to all public documents, including communication of the examining division and the decision to allow or reject a limitation request.

22. See the Guidelines for Examination in the European Patent Office, Part D-X, 5.

23. <https://www.epo.org/searching-for-patents/helpful-resources/first-time-here/definitions.html>.

24. Please consult the website of the relevant national patent office or the website of the EPO: <https://www.epo.org/law-practice/legal-texts/national-law.html> and <https://www.epo.org/law-practice/legal-texts/london-agreement.html>.

25. <https://www.epo.org/searching-for-patents/technical/espacenet.html>.

26. <https://www.epo.org/searching-for-patents/legal/bulletin/ep-bulletin-search.html>.

27. Please, see the manual of the EP Bulletin Search, for more details and information; available at <https://www.epo.org/searching-for-patents/legal/bulletin/ep-bulletin-search.html>.

28. <https://www.epo.org/searching-for-patents/legal/register.html>.

The tools PATSTAT²⁹ and Global Patent Index³⁰ offer additional search criteria, including the possibility to search for legal status codes. For example, EP legal status codes indicate the reasons for rejecting a limitation request.³¹

2.4 Statistical Data

All statistical data provided hereunder are based on data from the entry into force of the EPC2000 up to 31 December 2018.

Table 1 shows the number of limitations at the EPO and Table 2 shows the top five requesters for limitations.

As indicated in the data shown in Figure 1, almost a quarter of all limitation requests originate from U.S. patentees, who filed 118 limitation requests after the introduction in the EPC2000 of the central limitation procedure. German patentees (DE) filed 82 limitation requests and patentees from Great Britain (GB) filed 62 limitation requests.

As shown in Figure 2, 87 percent of the cases, the limitation request is allowed. In 2 percent of the cases, the limitation request is rejected, for substantive reasons (*e.g.*, because of objections to added subject-matter or clarity which could not be remedied). In 3 percent of the cases, the limitation request is withdrawn by the proprietor. In 3 percent of the cases, the limitation request is deemed not filed or not admissible, meaning that the

formal requirements have not been met (*e.g.*, due to a pending opposition or to the limitation fee not being paid).

Consequently, a large majority of limitation requests lead to limited patents.

Figure 3 shows the limitations at the EPO per technical field.

Table 1. Number Of Limitations At The EPO

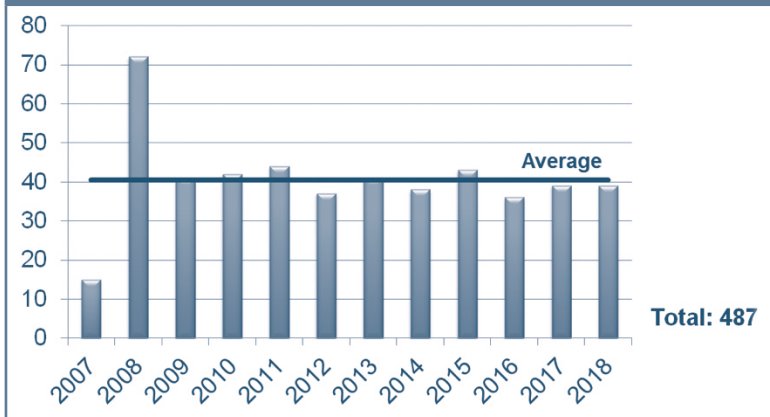


Table 2. Top 5 Requesters For Limitations

Hewlett-Packard	11
Novartis AG	7
Siemens	6
AstraZeneca AB	5
Nokia Corporation	5

29. <https://www.epo.org/searching-for-patents/business/patstat.html>.

30. <https://www.epo.org/searching-for-patents/technical/espacenet/gpi.html>.

31. Refer to the manual of PATSTAT and Global Patent Index for more details and information. The list of legal status codes is available at <https://www.epo.org/searching-for-patents/data/coverage/weekly.html>.

32. The country indicated corresponds to the country of residence of the first patentee listed on the published patent. In cases where several patentees are mentioned on the published patent, the country of residence of the first patentee listed applies.

Figure 1. Limitations At The EPO Per Country³²

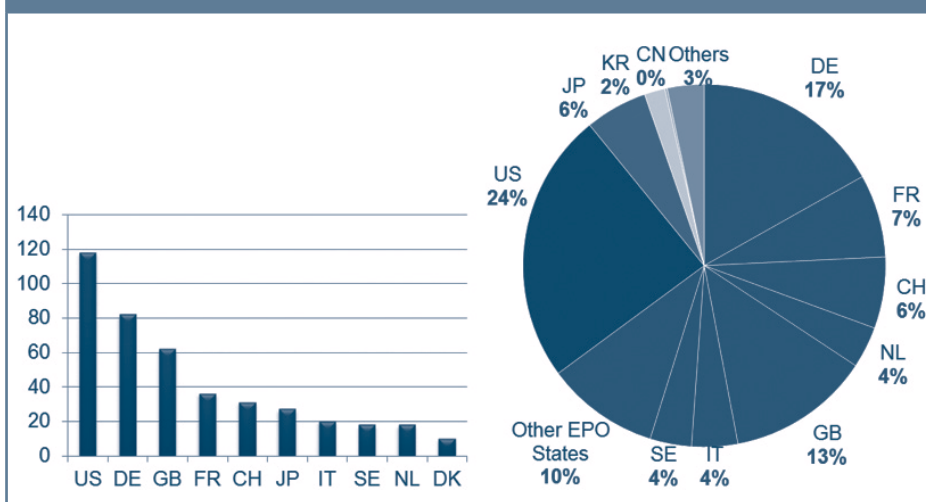


Figure 2. Outcome Of The Limitations At The EPO

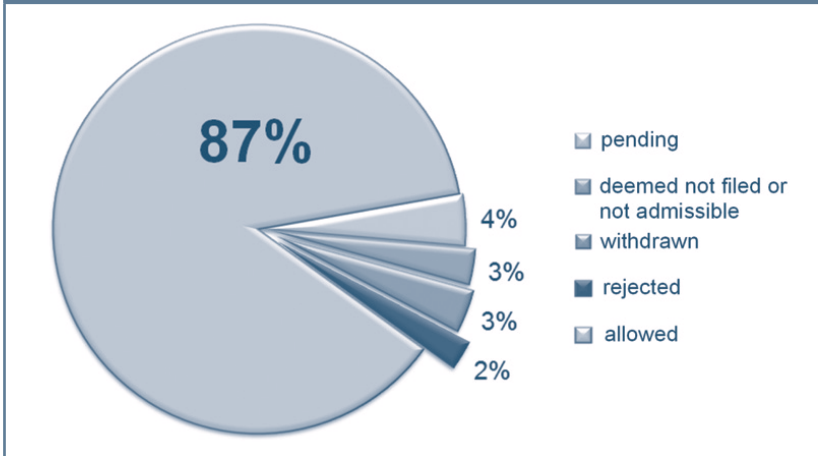
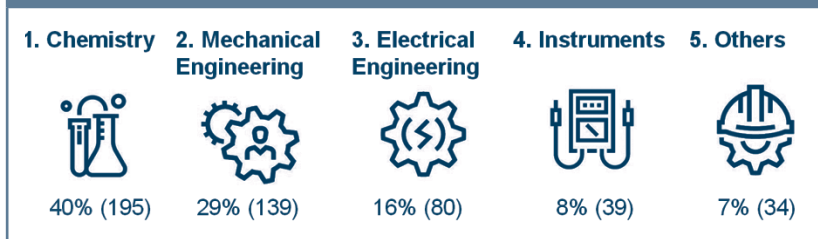


Figure 3. Limitations At The EPO Per Technical Field³³



In terms of timing, the average time of a limitation request after grant is 59 months, and the average duration of the procedure is six months.

3. The Revocation Procedure

3.1 Formal Requirements

The formal requirements relating to the revocation procedure are similar to those of the limitation procedure. It is thus referred to the above discussion and to the Guidelines for Examination in the European Patent Office, Part D-X, 2.

3.2 Final Steps

There are no substantive requirements for revocation proceedings. If the request is considered admissible, the examining division will revoke the patent and communicate that decision to the requester (Art. 105b(2) and Rule 95(1) EPC).

The decision applies to all contracting states in respect of which the patent was granted (Article 105b(3) EPC). It is not possible for the patent to be revoked only for some contracting states, and not for others.³⁴

33. The definition of the fields is based on the WIPO IPC technology concordance. The table is available at: http://www.wipo.int/export/sites/www/ipstats/en/statistics/patents/xls/ipc_technology.xls. The field "Others" corresponds to the technical field "other fields" in the WIPO IPC technology concordance table.

34. See the Guidelines for Examination in the European Patent Office, Part D-X, 3.

Relation To Opposition Proceedings

Opposition proceedings take precedence over revocation proceedings.³⁵ This means that if a revocation request is filed while opposition proceedings are pending, the revocation request will be deemed as not filed, and the revocation fee (if paid) will be reimbursed.

Contrary to the case of a limitation request, if an opposition is duly filed after a revocation request has begun but has not yet ended, the revocation proceedings will continue. Revocation proceedings thus continue even after an opposition is filed, and the case proceeds to opposition only if the request for revocation is deemed not to have been filed, is rejected as inadmissible or is withdrawn. Otherwise, if the patent is revoked, the opponent(s) will be informed of this situation and the opposition proceedings will be terminated.³⁶

3.3 Searching Revoked Patents

Patents revoked via the revocation procedure cannot be identified using Espacenet.³⁷

The European Patent Bulletin Search,³⁸ on the other hand, provides search criteria for this purpose.

The query "REVR=*" will retrieve all revocation requests, including the requests which were not successful. The query "REVR=2018*" will retrieve all revocation requests made in 2018. The query "REVD=*" will retrieve all patents revoked according to Article 105a-c EPC. The query "REVR=* ANDNOT REVD=*" will retrieve all revocation requests, which were rejected.³⁹

In the result tab of the EP Bulletin Search, it is possible to access the European patent register,⁴⁰ giving access to all public documents, including communication of the examining division and the decision to allow or reject a revocation request.

35. See the Guidelines for Examination in the European Patent Office, Part D-X, 7.

36. See the Guidelines for Examination in the European Patent Office, Part D-X, 7.1.

37. www.epo.org/searching-for-patents/technical/espacenet.html

38. <https://www.epo.org/searching-for-patents/legal/bulletin/ep-bulletin-search.html>

39. Please, see the manual of the EP Bulletin Search, for more details and information; available at <https://www.epo.org/searching-for-patents/legal/bulletin/ep-bulletin-search.html>.

40. <https://www.epo.org/searching-for-patents/legal/registry.html>.

The tools PATSTAT⁴¹ and Global Patent Index⁴² offer additional search criteria, including the possibility to search for legal status codes. For example, EP legal status codes indicate the reasons for rejection of a revocation request.⁴³

3.4 Statistical Data

All statistical data provided hereunder are based on data from the entry into force of the EPC2000 up to 31 December 2018.

Table 3 shows the number of revocations at the EPO and Table 4 shows the top six requesters for revocations.

As indicated in the data shown in Figure 4, 29 percent of all limitation requests originate from U.S. patentees (U.S.), who filed 24 revocation requests after the introduction in the EPC2000 of the central limitation procedure. German patentees (DE) filed 18 limitation requests, and Dutch patentees (NL) filed 17 revocation requests.

With regard to the outcome of revocations from the EPO, in 93 percent of the cases, the revocation request was allowed. This represents 77 revocations. Two revocation requests were rejected because the revocation fee was not paid. Four revocation requests were rejected because opposition was already pending when the revocation request was filed. In these four rejected revocation re-

quests, the patent was ultimately revoked at the end of the opposition proceedings.

Figure 5 shows the revocations at the EPO per technical field.

In terms of timing the average time of a revocation request after grant is 43 months, and the average time between the revocation request and the decision to revoke the patent is 2.5 months.

Table 3. Number Of Revocations At The EPO

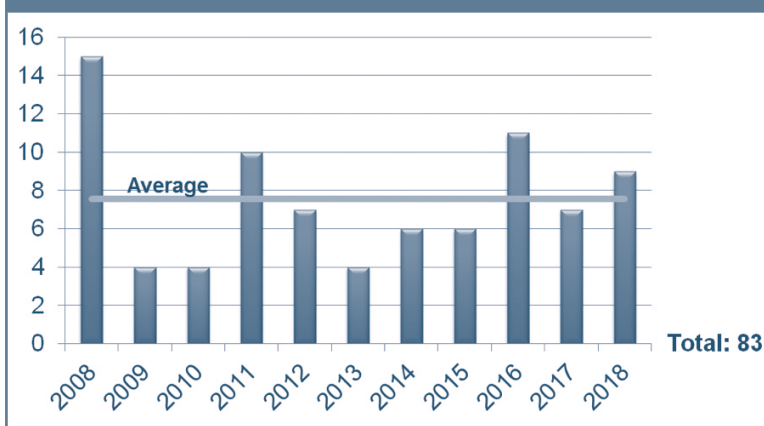


Table 4. Top 6 Requesters For Revocations

Koninklijke Philips Electronics N.V.	13
Vascular Control Systems, Inc.	6
Cambridge Enterprise Limited	4
BOEHRINGER INGELHEIM	3
Fisher-Rosemount Systems, Inc.	3
Ironwood Pharmaceuticals, Inc.	3

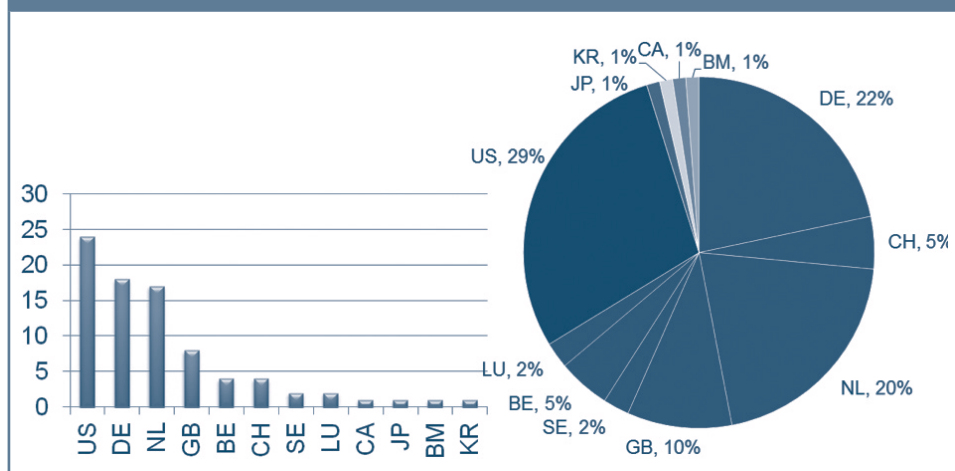
41. <https://www.epo.org/searching-for-patents/business/patstat.html>.

42. <https://www.epo.org/searching-for-patents/technical/espacenet/gpi.html>.

43. It is referred to the manual of PATSTAT and Global Patent Index for more details and information. The list of legal status codes is available at <https://www.epo.org/searching-for-patents/data/coverage/weekly.html>.

44. The country indicated corresponds to the country of residence of the first patentee listed on the published patent. In cases where several patentees are mentioned on the published patent, the country of residence of the first patentee listed applies.

Figure 4. Revocations At The EPO Per Country⁴⁴



4. Conclusion

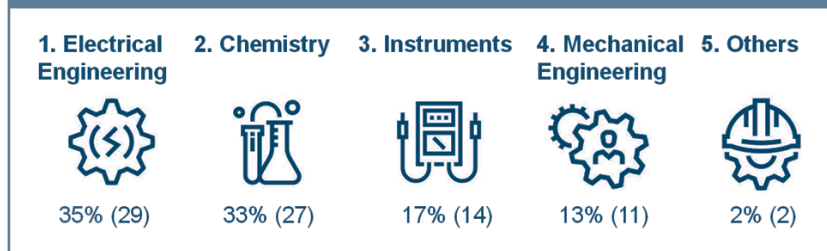
The above statistics show that the limitation and revocation procedures have met the goal for which they were created, namely curing the deficiency pointed out by the EBoA in G9/93 after the demise of the so-called “self-opposition.” The legislator, by introducing these central limitation and revocation procedures, has empowered patent proprietors with a quick and efficient tool to centrally limit or revoke their patents.

The procedure now in place is thus in line with the needs of the various stakeholders,⁴⁶ providing legal cer-

tainty as well as a possibility to prevent or mitigate costly and lengthy litigation proceedings. ■

Available at Social Science Research Network (SSRN): <https://ssrn.com/abstract=3470245>.

Figure 5. Revocations At The EPO Per Technical Field⁴⁵



45. The definition of the fields is based on the WIPO IPC technology concordance. The table is available at: http://www.wipo.int/export/sites/www/ipstats/en/statistics/patents/xls/ipc_technology.xls. The field “Others” corresponds to the technical field “other fields” in the WIPO IPC technology concordance table.

46. See *e.g.* the 2000 Diplomatic Conference proceedings, MR/24/00, p.83ff, available at <https://www.epo.org/law-practice/legal-texts/epc/archive/documentation/diplomatic-conference.html> and CA/PL 29/99 Rev.1, “Revision of the EPC: limitation procedure (Articles 105a-c, 68EPC),” dated 9 March 2000, available at <https://www.epo.org/law-practice/legal-texts/epc/archive/documentation/travaux-preparatoires/dc-documents.html>.