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VIA EMAIL ONLY (*consultation@ipaaustralia.gov.au*)

**Re: Implementing Accepted Recommendations from ACIP's  
Review of the Designs System**

Dear Sir or Madam:

Intellectual Property Owners Association (IPO) appreciates the opportunity to provide feedback on IP Australia's implementation of accepted recommendations from the Review of the Designs System by the former Advisory Council on Intellectual Property (ACIP).

IPO is an international trade association representing companies and individuals in all industries and fields of technology who own, or are interested in, intellectual property rights. IPO's membership includes about 175 companies and close to 12,000 individuals who are involved in the association either through their companies or as inventor, author, law firm, or attorney members. IPO membership spans over 30 countries.

IPO advocates for effective and affordable IP ownership rights and offers a wide array of services, including supporting member interests relating to legislative and international issues; analyzing current IP issues; providing information and educational services; and disseminating information to the public on the importance of IP rights.

We have reviewed the proposed options relating to ACIP's Review, and provide feedback relating to certain ACIP recommendations below.

**ACIP Recommendation No. 10 and the Identity of the Informed User:** IPO favors clarifying the identity of the 'informed user' to be one who needs only to be familiar with the product or similar products, and does not have to be an actual user of said products.

**ACIP Recommendation No. 12:** IPO supports introducing a 12-month grace period.

General Counsel  
**Jeffrey Kochian**  
Akin Gump Strauss Hauer & Feld LLP

**ACIP Recommendation No. 13:** IPO favors extending protection for partial designs to any product.

**ACIP Recommendation No. 14:** IPO supports protecting virtual designs as a standalone product (*i.e.*, protection is not tied to a physical product).

We again thank IP Australia for permitting IPO to provide these comments and would welcome any further dialogue or opportunity to provide additional information.

Sincerely,

A handwritten signature in black ink, appearing to read "Daniel J. Staudt", with a long horizontal flourish extending to the right.

Daniel J. Staudt  
President