



17 April 2026

General Office of the National Data Administration
Beijing
People's Republic of China

Via Email: zhidujianshechu@nda.gov.cn

Re: IPO's Request for Extension of Time to Comment on the "Guidelines for Data Property Rights Registration (Trial)" (Draft for Public Comment) Published on April 3, 2026

Dear National Data Administration:

The Intellectual Property Owners Association ("IPO") respectfully submits this request for an extension of time to provide comments to the National Data Administration ("NDA") on the "Guidelines for Data Property Rights Registration (Trial)" ("Draft") published on April 3, 2026.

IPO is an international trade association representing a wide array of stakeholders in all industries and fields of technology that own, or are interested in, intellectual property (IP) rights. IPO membership includes over 125 companies and 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.

The NDA's announcement soliciting public comments on the Draft was published on April 3, 2026, with a consultation period ending on April 19, 2026. IPO respectfully requests that the NDA consider granting an extension of time to comment until at least late May or, preferably, late June.

While IPO appreciates the opportunity to provide feedback, the current window does not allow adequate time to gather, synthesize, and approve substantive comments. Formulating a unified response from a trade group like IPO, which is comprised of a large number of diverse companies, requires extensive coordination and review. Furthermore, the timeline is particularly challenging for organizations like IPO due to the practical necessities of translating the Draft, translating comments, navigating time zone differences, and completing internal review processes across global teams.

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IPO believes there is significant value in receiving comments on policy drafts from diverse sources. This includes insights from innovators that actively contribute to the development of China's economy and its intellectual property system. Affording stakeholders additional time will ensure that the NDA receives highly substantive, well-considered, and comprehensive feedback from all sectors of society. This detailed feedback can ultimately aid the NDA in refining the guidelines before promoting implementation through pilot programs.

IPO thanks the NDA for its attention to this request and welcomes the opportunity to provide substantive comments if possible.

Sincerely,

A handwritten signature in cursive script that reads "John Cheek".

John Cheek
President

Enclosure