

## 2 System of Publication of Application <sup>(\*)</sup>

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*While more than 40 years have passed since the introduction of the system for laying open of application into Japan in 1970, the circumstances surrounding Japan over intellectual property system have been changing such as the significantly shortened period after the request for examination of an application until the first action (FA) and the rise of developing countries in the field of intellectual property along with the globalization of markets. Whereas some Japanese companies select their competitiveness maintaining strategy with keeping secret their developed technologies, such concerns are also pointed out that technical information is diffused via patent publications, resulting into imitations or the like. Given such circumstances, it becomes necessary to reconsider the significance of the system of publication of application from the perspective of what role this system should play in the context of the Patent Act, the purpose of which is to contribute to the development of industry, so that Japan will be able to maintain its industrial competitiveness even though Japanese companies or the like are facing with severe competition. Therefore, this research was conducted aiming to prepare materials for reconsidering the significance of the existing system of publication of application in Japan through survey of the systems of publication of application and related systems in Japan and other countries as well as discussions with experts.*

### I Introduction

#### 1 Background and purpose of this research

System of publication of application is a system wherein the content of a patent application is published after the expiration of a certain period of time from the date of filing of the application. This system was introduced in Japan in 1970 concurrently with the request for examination system, with a view to eliminating the problem of the details of inventions described in patent applications being kept unpublished for an extended period of time due to the delay in examination, resulting in the duplicate research and development carried out by other inventors.

More than 40 years have passed since the introduction of the system of publication of application. During this period, the time consumed after the filing of a request for examination of an application until the issuance of the first action (first action pendency) has been reduced significantly, currently to 11 months, and it seems possible to further reduce the time after the filing of an application until the establishment of rights (total pendency) to 14 months. Meanwhile, with the intellectual property systems around the world becoming more multilateral due to the rise of developing countries in the field of intellectual property along with the globalization of markets, the circumstances surrounding Japan and its application publication system have been changing dramatically.

Now it is time to reconsider the significance

of the system of publication of application from the perspective of what role this system should play in the context of the Patent Act, the purpose of which is to contribute to the development of industry, so that Japanese companies will be able to maintain their industrial competitiveness in the face of severe competition on globalized markets.

Looking at the recent situation from a practical viewpoint, some Japanese companies, as their intellectual property strategy, have been trying to maintain their competitiveness by treating the technologies that they have developed as trade secrets, rather than making such technologies available to the public. It is also pointed out that technical information held by Japanese companies is diffused via publications issued under the system of publication of application, due to which inventions devised by these companies — the fruits of their investment in research and development — are imitated outside Japan. If that should be the case, it would be a problem that could lead to a huge loss of national interest. The first step we should take to avoid this is to investigate and ascertain the actual state of imitation by means of such technical information diffused from Japan, and thereby gather materials for discussing the significance of the system of publication of application.

On the other hand, the system of publication of application is said to be effective in preventing duplicate research and investment, securing the opportunity for third parties to submit

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observations, preventing submarine patents and so forth. Furthermore, seeing that other countries publish patent applications 18 months after the filing date, the existing system of publication of application in Japan is held to be appropriate from the aspect of international harmonization of systems.

Given such circumstances, this research aims to prepare materials for reconsidering the significance of the existing system of publication of application in Japan. To achieve this, we investigated the systems of publication of application and related systems operated in other countries and under international treaties as well as the effects of publication of applications, while gathering information on what Japanese companies are actually concerned about in connection with the diffusion of technical information via publications of patent applications under the system of publication of application and how this system is utilized by users for strategic purposes.

## **2 Method of this research**

In this research, we focused on the systems of publication of application and related systems operated in Japan, the United States, the United Kingdom, Germany, France, China, and Korea, and such systems operated under the European Patent Convention (EPC) and the Patent Cooperation Treaty (PCT), and looked into the information published through such systems in order to classify these systems. In addition, we sent questionnaire sheets to the law firms in the selected countries to obtain information on the background to the introduction and other details of the systems of their countries, and also conducted a questionnaire survey targeting Japanese users to ascertain their actual use and needs of the systems. We compiled the information thus obtained and provided it to a committee established with nine experts to discuss the significance and other issues of the system of publication of application.

## **II Outlines of systems of publication of application and various systems related thereto in Japan and major countries**

### **1 Japan**

In Japan, the system of publication of application was adopted through the partial amendment to the Patent Act in 1970 (Article 64 of the Patent Act<sup>1</sup>). This system was designed to make the content of a patent application known to

the public when one year and six months (18 months) have passed since the date of the filing of the application or the priority date, irrespective of whether the application has entered the examination process. It was introduced for the purpose of eliminating the problem of the details of inventions described in patent application being kept unpublished for an extended period of time due to the delay in examination, causing companies to carry out activities in an uncertain situation and forcing them to engage in duplicate research and investment. Upon the introduction of the system of publication of application, the request for examination system was also introduced with the aim of promoting examination. The period until the publication of an application was set as 18 months from the date of the filing in the first country, out of consideration to equal treatment for patent applications claiming priority and those without such priority claim. The matters to be published are as listed in Article 64, paragraph (2) of the Patent Act. As in other countries selected for the research, request for early publication system is available in Japan. This system allows an application to be published at an earlier stage if the applicant so requests, thereby enabling the application to be cited as publicly known art and serve as the ground for rejecting the later application in the examination process. It also enables applicants to obtain the right to claim compensation when their inventions are used by others. As in other countries selected for the research, in order to prevent an application from being published, the applicant needs to withdraw the application before the preparations for the publication begin. The effects of publication of application include providing applicants with provisional protection for their right to claim compensation, rejecting the later application through the prior art effect, and securing the opportunity to submit a third party observation. The publication is made available via the Internet. These effects and method of the publication are also in other countries selected for the research. The earlier application based on which another application claims domestic priority is deemed to have been withdrawn when one year and three months have passed since the date of the filing of the earlier application and therefore it is not published but is available for public inspection upon request. There is no pre-examination search report system.

### **2 United States**

The system of publication of application was

introduced through an amendment to the Patent Act on November 29, 1999 (S.1948 Intellectual Property and Communications Omnibus Reform Act of 1999), and has been applied to applications filed on or after November 29, 2000. Under the U.S. patent system before this legislation, applications pending in the examination process were not laid open to the public. This caused the problem of duplicate research. Moreover, since the term of a patent was 17 years from the date of the issue of the patent, there was the prevalence of submarine patents that were “concealed” without being published or registered for an extended period of time by delaying examination. After the implementation of the TRIPS Agreement in 1996, the U.S. patent law was amended to designate the filing date as the starting day for computation of the term of a patent. This amendment, in combination with the revision to the patent term, stopped the emergence of submarine patents that would have been valid for more than twenty years from the filing date. The subsequent amendment to the patent law in 1999, including the introduction of the system of publication of application, further reduced the possibility of submarine patents to emerge. However, the United States still has a system which allows an application to be kept unpublished at the request of the applicant if the application is filed only in the United States. The earlier application based on which another application claims domestic priority is not published but is available in the form of a copy of the file of the later application claiming priority, if it is contained in such file.

The United States does not have a search report system. It takes about one year and a half after an application is filed until the examiner begins the examination of the application. Therefore, if the applicant abandons his application before the examination starts, and submits a written declaration of abandonment and a request for refund of the search fee to the United States Patent and Trademark Office (USPTO), the applicant may obtain a refund. The United States does not adopt the request for examination system, and all applications filed go through the examination.

### **3 United Kingdom**

The system of publication of application was introduced through revision of the Patent Act by Art 16 of Act to establish a new law of patents applicable to future patents and applications for patents; to amend the law of patents applicable to

existing patents and applications for patents; to give effect to certain international conventions on patents; and for connected purposes 1977 c37 29 July 1977, coming into force 1 June 1978, bringing it in line with the EPC. Inventor may apply to waive his right to have his name mentioned as the inventor. It is possible to withdraw a request for early publication, provided that the preparation for publication of the application has not begun. Approximately one month before publication, the UKIPO will issue a communication advising as to an estimated publication date. The communication will also include the date on which preparations for publication will be complete (PPC date), which is usually a matter of days after the date of the communication. The UK priority application from which another application claims the priority will be published by being made available in the UKIPO file of the priority claiming application as soon as the latter application is published. It can be accessed via the web page mentioned above.

A search under section 17 Patents Act 1977 may be requested by the later of: the end of 12 months beginning immediately after the earlier one of the priority date and the filing date; or two months beginning immediately after the filing of the application. If a search is not requested within the prescribed period, the application will be treated as having been withdrawn. The purpose of the search system is to attempt to locate all prior publications that will be relevant to the assessment of novelty and inventive step of the application during substantive examination. The search does not concern matters of prior use, and is restricted to descriptions of prior art in published documents. The search may be used by the applicant to gauge the likelihood of success of the application before proceeding with publication and substantive examination. Request for substantive examination system has been introduced.

### **4 Germany**

According to the 1967 Patent Amendment Act (Gesetz zur Änderung des Patentgesetzes, des Warenzeichengesetzes und weiterer Gesetze v. 4. 9. 1967), which came into force on 1 October 1968, the possibility of public file inspection safeguards the rights of third parties (i.e. competitors) to be timely informed about applications pending before the German Patent and Trademark Office (GPTO). However, under this system, an interested party had to conduct file inspection so as to become aware of the

content of the application, and it was believed that the number of requests for file inspection would increase significantly, so the GPTO started publishing the application as originally filed in the form of "Offenlegungsschriften" for the applications since 1 January 1980. Publication after 18 months was seen as a good compromise between applicant's interests to be able to withdraw his application due to a lack of prospect for obtaining appropriate protection, and the right of third parties to be timely informed about pending applications. For applications claiming priority the term had to be calculated based on the priority date so as not to provide foreign applicants with an advantage. For applications claiming priority the term had to be calculated based on the priority year so as not to provide foreign applicants with an advantage. At the time of introduction, there were strong efforts to harmonize patent law across Europe. Moreover, there were ongoing negotiations resulting in the PCT which provided for mandatory publication after 18 months. On a national level, there was a huge backlog of applications at the GPTO because of an increase in the number of filings and an increase in the prior art documents which had to be assessed during examination of each individual application. There was a problem of duplicate developments by competitors due to delays in examination. Priority application based on which domestic priority will not be published, the priority application may, however, be accessed by file inspection of the priority claiming application.

The request for search was introduced as a preliminary, cheaper and more economic way to assess the patentability and possibly also the economic impact of an application. However, separate search is not mandatory and examination may be requested without previous search in which case the fee for examination will be higher.

## **5 France**

The system of publication of application was introduced through a revision of the Patent Act by Art.17 Loi no. 68-1 du 2 janvier 1968 tendant à valoriser l'activité inventive et à modifier le régime des brevets d'invention coming into force 1 January 1969, harmonizing with introduction in other European countries. The publication of application aims at (1) informing third parties of the emergence of a new patent right to eliminate negative effects to industries by keeping application unpublished, (2) enabling third parties to raise observations as regards the novelty or the inventive step of the application, which, if

relevant, will be taken into account by the examiner when drawing up the definitive search report, (3) making the patent application enforceable vis-à-vis third parties. The question has been debated as to whether an eighteen month period should be regarded as too long or too short a time period. Withdrawal of a request for early publication under L.612-21(1) is not stipulated and not possible.

Applications which serve as the basis for claiming domestic priority are systematically published, even if said applications are rejected or withdrawn before the term of technical preparation for publication. The only way to avoid publishing in such a case is to withdraw the prior application, and to waive the priority right.

The publication of application takes place along with the publication of a preliminary search report, and therefore is of interest for the applicant who can therefore have a better idea of the economic value of his invention, and for third parties who observe actually invalid patent.

Search Report is drawn up for every application which has received a filing date. If the search report fee is not paid within one month of the filing date, the application will be rejected. The search report procedure, which does not consist of an actual examination of the application, relates to drawing up of a document setting forth information of the prior art susceptible to jeopardize the novelty and/or the inventive step of the invention. The search report is of a particular interest, for the applicant, as the results of the search report, together with the observations possibly raised by third parties, will enable the applicant to assess the scope of the protection he may benefit from and to make changes if necessary to the claims initially filed for the purpose of securing the validity of the patent that will be granted, and for third parties, who will be provided with information regarding the patentability of the invention and who will benefit from the possibility to raise observations aiming at disputing the validity of the claims of the application.

## **6 China**

The system of publication of application was introduced after the initial enactment of the Patent Law 1984 (adopted at the Fourth Meeting of the Standing Committee of the Sixth National People's Congress on March 12, 1984; put into effect by Order of the President of the People's Republic No. 11 on April 1, 1985). According to Article 34 of the Patent Law 1984, the State

Intellectual Property Office (SIPO) was authorized to publish invention patent applications at any time within the 18-month period from the date of application. However, under this system, applicants were unable to predict when their applications would be published, which could undermine their interest by preventing them from withdrawing their applications before publication. To solve this problem, the Patent Law 1992 reformed this system, and now applications are to be “published within 18 full months from the date of application.” Some applicants may seek earlier publication of their applications, and therefore the Patent Law provides for the system of earlier publication at the applicant’s request. A request for earlier publication may be withdrawn, and if the request is withdrawn, the application documents are published according to the ordinary schedule. An inventor may request SIPO not to publish her name but may not withdraw such request and demand that her name be published. The earlier application based on which another application claims domestic priority is deemed to have been withdrawn as of the date of filing of the latter application. Accordingly, if the earlier application has not been published when the later application is filed, the earlier application will be kept unpublished and there is no way to inspect the content of such unpublished application.

There is no search report system. The request for examination system is adopted.

## **7 Korea**

The system of publication of application was introduced under the Amended Patent Act of December 31, 1980 (Act No. 3325; effective as of September 1, 1981) as a reform measure for the traditional examination principle. A request for earlier publication may be withdrawn. The earlier application based on which another application claims domestic priority is deemed to have been withdrawn when one year and three months have passed since the filing date of the earlier application, and therefore it is not published. In this case, only the applicant or her representative may confirm the content of the earlier application by obtaining its file, whereas no third party has the chance to inspect such content.

There is no search report system. The request for examination system is adopted.

## **8 EPC**

System of publication of application was introduced at the beginning of Convention on the

Grant of European Patents of 5 October 1973 and coming into force on 7 October 1977. System for laying open of application was referred to the existing similar provisions in various countries and in the PCT and is aiming at: prompt information of the public about pending applications; provisional protection for claimed subject matter; appropriate term for existence of older rights which are unknown to the applicant; and possibility to obtain results on novelty for first filings before publication. It might be possible to withdraw a request for earlier publication provided that the technical preparations for publication have not been concluded. The applications based on which priority has been claimed are published provided they are not actively withdrawn by the applicant before publication.

The necessary search, in combination with deferred examination, is a compromise between a registration system and system which involves automatic substantive examination. Based on the search report, the applicant of a priority application can assess the patentability before expiry of the 12 month term for filing in foreign countries. Firstly, it was considered to provide an opinion on novelty which was to be issued by IIB (Institut International des Brevets) in The Hague. The opinion was subject to a positive result of a preliminary examination concerning obvious deficiencies and the payment of a fee. The term “opinion on novelty” was later replaced by “search report”, it was decided to incorporate the IIB into the EPO as the search division. Request for substantive examination system has been introduced.

## **9 PCT**

The system of publication of application was adopted when the PCT was first established on June 19, 1970, and came into force on January 24, 1978. It is designed to fulfill the publication of applications as required under the national law of the designated country by way of international publication, and to achieve centralization of patent information. The PCT does not provide for the prior art effect of published applications. It is considered to be possible to withdraw a request for earlier publication provided that the technical preparation for international publication has not been completed. Since the PCT does not provide for the withdrawal of an application based on which another application claims priority, such application which serves as the basis for claiming priority is also published. Search reports are

established for all applications, and there is no system for requesting search reports. Search reports are prepared for the purpose of discovering the prior art relevant to each application, thereby reducing the duplicate workload in prior art search at patent offices of the member countries.

As for a request for examination system under the PCT, applicants may demand, but not mandatorily, international preliminary examination to obtain preliminary and non-binding opinions on their applications.

## **10 Other countries**

Focusing on when an application is published, we investigated the countries which publish applications at unique points in time. From among the 187 countries/treaties listed in the “Table of Outlines of Industrial Property Laws in the World” (prepared by the JPO), we selected 91 countries/treaties which have the system of publication of application as a population, and extracted and closely investigated eight countries which publish applications at points in time other than upon the expiration of a period of 18 months from the filing date or priority date. Among the eight selected countries, the period of time until the publication of an application is clearly prescribed in four countries: 12 months in Azerbaijan; 19 months in Laos; 19 months in Vietnam; and 18 months in New Zealand (under an amended law effective as of September 13, 2014). Such period is not stipulated in patent laws in the remaining four countries, namely, Thailand, Honduras, El Salvador, and Tonga.

## **11 Investigation on the discussion process toward the introduction of the system of publication of application**

The system of publication of application was introduced in 1970 in Japan. Before introduction, the Industrial Property System Investigation Team of the subcommittee of the Industrial Property Council investigated and discussed the systems operated in the Netherlands and other countries.

During the period since before the 1950s until the time of the introduction of the publication system, most European countries had published the content of the registered patents upon the grant of the patents. It was assumed that in the 1950s, a record-breaking number of applications would be filed, and as a result, the backlog of unexamined applications would increase and the time to wait for examination

would be extended. Given such assumption, it was a concern that: applicants would have no means of protection until patents were granted; third parties would face legal uncertainty due to pending applications being kept secret for an extended period of time; and from a policy perspective, the resources used and investment made by third parties in their research and development regarding the same subject matters as those of the pending applications would end up as losses. The necessity to cope with these possible problems was discussed.

On January 1, 1964, the Netherlands put into effect the amended Patent Act that aimed to reduce the backlog of patent applications. This amendment introduced the deferred examination system for the first time in the world, under which applications would be examined provided that examination was requested within seven years from the filing date, and applications for which no such request was made would be deemed to have been abandoned. On this occasion, the country also introduced the publication system in order to prevent the situation where examination was not requested for many years from the filing date and the content of applications would be kept unpublished during such period. The publication under the system of that time was made by disclosing the name of the applicant, the title of the invention and other matters in a publication when 18 months passed since the filing date, and the patent specifications were available for inspection at the patent office. In addition, third parties were given the opportunity to submit observations regarding published applications.

In the legal amendment process, the subcommittee of the Industrial Property Council discussed various issues including the benefits and harm of the system of publication of application, requests from industry, details of the system, and appropriate time of publication, while referring to the situations in other countries based on the results of the overseas investigation, as well as a new system that would be proposed for introduction, and compiled the outcome of the discussion in a report.

## **III Status of use of the system of publication of application in Japan**

We conducted a questionnaire survey targeting Japanese companies, the main users of the publication system, and investigated the

status of their use of the publication system and possible changes in their manner of using the system along with the speeding up of the examination process. We targeted a total of 1,124 companies, consisting of 924 companies which were regular members of the Japan Intellectual Property Association and 200 small and medium-sized enterprises. We obtained valid responses from 493 companies.

We asked the respondents about what benefits they find in using the system of publication of application from the standpoint of applicants. The tendency regarding the benefits they cited was the same for both publications in Japan and publications abroad. Prevention of acquisition of patents by competitors was the most frequently cited benefit, by 463 companies (93.9%) for publications in Japan and 424 companies (86.0%) for publications abroad. In the second place was the publicity effect of their technologies.

We also asked the respondents about the purpose of using the system of publication of application from the standpoint of third parties. The tendency regarding the purposes they cited was also the same for both publications in Japan and abroad. "To identify applications that may conflict with the company's business if patents are granted" was the most frequently cited purpose, by 433 companies (87.7%) for publications in Japan and 389 companies (78.9%) for publications abroad.

In response to the question concerning the measures or arrangements adopted for applications in fear of diffusion of their technical information via publications of patent applications, the largest proportion of the respondents, 339 companies (68.8%), answered that they "fully consider whether to disclose inventions in patent applications or keep them as trade secrets," which suggests that they attach importance to consideration prior to the filing of applications.

As for the registration of a patent prior to the publication of the application, which is a possible effect of the speeding up of the examination process, 260 companies (52.7%) cited the "concern about the loss of the opportunity to submit observations before registration."

## **IV Consideration on the system of publication of application**

### **1 Consideration on the significance of the system of publication of application**

According to the questionnaire survey, it is

found that users recognize the system of publication of application as playing a role in preventing duplicate research and investment, diffusing technical information, and providing information concerning competitors' rights.

It was also confirmed that the system of publication of application is beneficial to users due to the prior art effect, that is, an application they file with the objective of carrying out business more freely will function to prevent a later application from generating rights.

### **2 Consideration on the period from the filing to the publication**

The committee members exchanged opinions regarding the 18-month period from the filing date or priority date until the publication. There was an opinion that if the publication is made earlier, it would be favorable to those who use the published information because they would be able to access the information earlier, whereas it would be unfavorable to applicants because they would have less time for keeping their information secret, and therefore balance should be taken into consideration when designing the system.

Meanwhile, the Economic Partnership Agreement between Japan and Malaysia that took effect in 2006 clearly stipulates that applications will be published after the expiration of a period of 18 months from the filing date, and thus it is Japan's obligation under the EPA to maintain this period. Furthermore, under the Japan-U.S. Framework for a New Economic Partnership, Japan requested the United States to publish patent applications 18 months from the filing date, on which both countries reached an agreement. In the process of reforming the patent system of Japan, not only multilateral treaties but also such bilateral agreements should be complied with, and hence, the current 18-month period until the publication cannot be changed unless amendment is made to such treaties and agreements.

Another opinion was that even if the period until the publication of patent applications filed in Japan is changed, international applications under the PCT will continue to be published 18 months from the filing date unless the PCT is amended, which gives rise to doubts about the merit of making the time of publication of Japanese applications inconsistent with the time of publication of international applications under the PCT.

### **3 Consideration from the perspective of diffusion of technology**

The system of publication of application makes the contents of applications filed in major countries, including the bibliographic information, abstract and full text of the specification, available in electronic form and accessible via the Internet. Furthermore, the progress in machine translation technology is increasing the accessibility of publications written in foreign languages. The concern about publications of applications being used to file similar applications or imitate inventions was pointed out in the past, but none of the committee members expressed that such concern has an influence on Japanese industry. According to the questionnaire survey, 64 (13.0%) of 493 companies expressed that they suffered disadvantages due to intense competition resulting from their own inventions, which became available to others via publications, being put into practice in competitors' business or utilized in competitors' research and development. At the same time, there was an opinion to the contrary: that promotion of competition through diffusion of technical information is beneficial to society as a whole.

There was also an opinion that the decision to file a patent application is made at the discretion of the applicant who seeks to obtain rights, and in this respect, the issue of diffusion of technology via the publication of an application depends on the applicant's choice on his own responsibility between disclosing the invention in a patent application or keeping it secret, and it can hardly be regarded as an institutional issue.

### **4 Consideration from the perspective of strategic use of the system publication of application**

Users decide the timing for requesting examination or adopt various strategies for protecting their inventions in line with the existing publication system. According to the questionnaire survey, 339 (68.8%) of 493 companies responded that they "fully consider whether to disclose inventions in patent applications or keep them as trade secrets." One respondent expressed an opinion that it chooses to keep inventions secret if they are by nature unsuitable for patenting.

Furthermore, 38 companies (7.7%) responded that they "file a request for examination simultaneously with filing an application or at any other early stage and obtain the examination result before the application is published, so that an

application with less likelihood of patenting will be kept unpublished," in fear of the imitation of their technologies through diffusion of technical information via publication. Since the average time from the filing of a request for examination to the issuance of the first action by the JPO has been reduced to less than 11 months, it is now possible to obtain the first action before the publication and decide to withdraw the application based on the examination result, which may offer an additional choice to applicants.

As other strategic uses of the system of publication of application, one respondent stated that it withdraws an application before publication and then files an application again in cases where it cannot see the development trends after filing the first application or where it finds the article under development falling outside the scope of claims of the original Japanese application and therefore attempts to obtain a broader scope of rights covering such article under development. Another respondent stated that if it becomes necessary, before the publication of an application, to obtain rights for inventions in the related technical fields in view of the research and development trends, the respondent withdraws such earlier application so that it would not be cited as prior art, and files multiple patent applications as necessary for protection of the product as a whole.

## **V Conclusion**

As a result of the research, we found that the existing system of publication of application is appropriate for the following reasons: (i) the existing system plays an important role under the patent system in publicizing technical information and facilitating examination; (ii) maintaining the existing system is Japan's obligation under international treaties; (iii) the existing system is in harmony with application publication systems operated for international applications under the PCT and those operated in other countries; and (iv) the existing system ensures balance between applicants and third parties. Seeing that applicants make strategic use of this system, we consider that the system is accepted in industry. In conclusion, the existing system should be maintained.

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<sup>1</sup> <http://www.japaneselawtranslation.go.jp/law/detail/?ft=1&re=01&dn=1&x=35&y=9&co=01&ia=03&ky=%E7%89%B9%E8%A8%B1%E6%B3%95&page=24>