

Sent Via Email

Opportunity to provide further input to the IGR review in light of the LSB investigation report.

13 June 2018

Hi Craig - thanks for the opportunity to comment further. I think the main thing to say is that a lot of the problems that the SRA faced were as a result of it being part of TLS (a committee I think, technically?). Our experience at IPReg, as a company limited by guarantee, is that it is our Board of Directors that is responsible for IPReg's finances, risk management, governance, staff T&Cs, etc. Although there is still a pressing need for more clarity about the residual role of CIPA and CITMA, many of the day to day issues faced by the SRA could be avoided in future if it was a separate legal entity like IPReg.

I understand that the LSB will be publishing another document on the IGRs soon, although there is no clear indication of the timing. We will respond to that more fully, but could I suggest that it would be helpful if it provided more clarity about the relationship between the LSB's performance framework, the AARs' role and the IGRs - now that you have requested information from each of the regulators, I hope this will be a less tricky task than earlier in the year.

Please let me know if you have any questions or would like to discuss.

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