

Your Ref: IP Australia Fee Review 2011 – Consultation Paper

Quote in reply: TIPS Committee: 21000332/46

13 January 2012

Fee Review
IP Australia
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By email: FeeReview@ipaustalia.gov.au

Dear Director

IP AUSTRALIA FEE REVIEW 2011 - CONSULTATION PAPER

I refer to the IP Australia Fee Review 2011 Consultation Paper. This letter has been written with the assistance of the Technology and Intellectual Property Committee of the Queensland Law Society.

The Society notes that the scope of the paper is to “keep prices as low as possible and fee structures as simple as possible” with the main philosophy being to keep start up fees low and increase renewal fees. However as the fee review model is calculated by inputting many financial variables into test scenarios, the objective of keeping fee structures simple may be difficult to achieve. The Society particularly notes that this will make forecasting renewal fees a difficult process for SME’s.

The Society therefore recommends that there be more transparency and certainty in the fee review model by:

- Publishing the dates when fee increases are anticipated to occur; and
- Dealing with nominal fee increases during the 2012-2016 cycle by either a fixed percentage rate increase or an increase linked to a respected cost of living index, such as the consumer price index.

Thank you for the opportunity to provide feedback on the consultation paper.

If you have any queries regarding the contents of this letter, please do not hesitate to contact our Policy Solicitor, Louise Pennisi on (07) 3842 5872 or l.pennisi@qls.com.au

Yours faithfully

Annette Bradfield
Deputy President