

This document includes some recent decisions of the EPO in 2012 with regards to software related inventions and shows relevant extracts from the respective decisions.

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T 1575/07 (Managing maintenance/ACCENTURE) of 12.1.2012  
**IDENTIFICATION, CATEGORIZATION, AND  
INTEGRATION OF UNPLANNED MAINTENANCE, REPAIR  
AND OVERHAUL WORK ON MECHANICAL EQUIPMENT**

**Inventive step - filtering and displaying maintenance tasks related to a given location (no  
Inventive step - administrative scheme)**

Applicant: Accenture Global Services Limited  
Application number: 02779301.7  
IPC Class: G06F 17/60  
Cited decisions: T 0049/04, T 1143/06, T 0154/04

According to the problem and solution approach, the objective technical problem is based on the distinguishing features. It is therefore true that when there are many distinguishing features, as when there is no close prior art, the problem tends to be broad. However, only the features having technical character should be considered. If these are few in number a narrower, more specific, formulation of the problem is appropriate.

<http://www.epo.org/law-practice/case-law-appeals/pdf/t071575eu1.pdf>

The claimed invention is supposed to solve the technical problem of filtering data retrieved from the database so that only the most useful or relevant data was presented to a user. This was a technical problem in light of, for example, T 49/04 Text Processor/WALKER (not published in OJ EPO). The present invention, by limiting the amount of data retrieved to only those tasks associated with a selected task, ensured that the user could work more efficiently since only relevant information would be displayed, improving readability and avoiding overwhelming the user with details of tasks unrelated to the selected maintenance task. Maintenance tasks for an airplane, for example, may number in the hundreds or thousands.

The above technical problem was solved by associating planned task data with unplanned task data in a database on the basis of location data. This ensured that, when a user identified a planned maintenance task for some equipment, only the unplanned maintenance tasks that were associated with the identified planned maintenance task were retrieved. The planned maintenance task was identified using a user interface and the relevant data was retrieved from a database such that the presently claimed invention provided a technical solution to this technical problem.

Claim 1 reads as follows:

"A method for managing maintenance of equipment comprising:

storing, in a database , first data defining a plurality of planned maintenance tasks for equipment;

storing, in the database, second data defining a plurality of unplanned maintenance tasks for the equipment;

storing, in the database, location data associating the planned maintenance tasks with the unplanned maintenance tasks where the location data identifies the physical location on the equipment associated with completion of the planned maintenance tasks and associated with the unplanned maintenance tasks;

identifying using a user interface a planned maintenance task for the equipment; and

based on the location associated with completion of the planned maintenance task, retrieving from the database all unplanned maintenance tasks that are associated with the identified planned maintenance task."

In this case the Board does **not** consider that it is a **general statement** to the effect **that any feature that relates to "how" information is conveyed to the user involves technical considerations**. In particular, if the "how" simply concerns putting data in a table for easier comprehension, this is clearly still only a presentation of information, excluded from patentability.

Showing **data that is useful or relevant to an administrative maintenance scheme is essentially a part of that administrative scheme and not part of a technical process**.

Basing the choice on the "location" of the maintenance task does not change that. The only link to anything technical is that the maintenance is on "equipment". However, this is a remote connection and is not directly related to the displaying, which has to do with the administrative process, and thus cannot contribute to the technical nature of the problem. The problem reduces to that of implementing such a filtering. The **claim gives no details of the actual implementation**, and the Board agrees with the examining division that it would be obvious to consider using standard data processing hardware containing a database and a user interface for this purpose.

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## T 1216/08 (Authenticating a program image/ROVI) of 13.1.2012 **System and method of verifying the authenticity of dynamically connectable executable images**

**Novelty - yes**

**Inventive step – yes**

<http://www.epo.org/law-practice/case-law-appeals/pdf/t081216eu1.pdf>

The invention deals with the authentication of software in a dynamic loading environment. It is known to calculate an electronic signature for the image of a given program (a "disk image") so that by authenticating that signature later it can be determined whether the program image was changed. If the program image normally does not change a failure to authenticate the signature may be taken to indicate that the program image was tampered with and should, hence, be rejected as insecure. This approach fails however if the program image contains pointers which are legitimately modified during program loading and linking. To address this problem, the invention proposes to determine in a given program image the "pointers that are in need of fixing up" and to sign, instead of the entire program image, only "selected content of the program image" excluding these pointers. This is claimed in the following claim 1.

"A system for determining the authenticity of a program image having one or more pointers that are in need of fixing up by a program loader, the system comprising a validator arranged to:

generate at a first point in time a reference digital signature based upon a selected content of the program image; and

generate at a second point in time an authenticity digital signature based on said selected content of the program image, wherein the validator is further arranged to compare the reference digital signature with the authenticity digital signature to determine the authenticity of the program image,

characterised in that said selected content of the program image excludes each pointer located within said content that is in need of fixing up by a program loader."

The closest prior art also addresses the problem of authenticating an electronically signed program in the context of linking. It provides that code authentication is possible on the card up until the final linking step but not after that. This is sufficient to authenticate a program loaded onto the card before it is run and to run only programs which have not been tampered with before loading.

Beyond this prior art, the claimed invention enables code authentication also after final linking or even after the program has been executing for some time because it does not disclose the generation of a signature from content from which the pointers requiring fixing up have been excluded. This feature hence further increases the security of the system.

While increased security is an obvious desirable in general, the prior art does not specifically disclose the need for code authentication after linking. This omission is consistent with the apparent assumption in that the chip card itself is safe. The board thus considers that the prior art contains no prompt to increase the security by enabling run-time code authentication on the chip card, nor does it suggest to achieve this by means of said differentiating feature.

In the board's judgment thus the subject matter of the claim is not obvious in view of the prior art and therefore based on an inventive step.

Examples of recent 2012 Board of Appeals decisions related to Software Innovations

Application number: 00950637.9  
IPC Class: G06F 1/00  
Applicant name: Rovi Solutions Corporation  
Opponent name: Needle, Jacqueline

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