

O-291-14

TRADE MARKS ACT 1994

IN THE MATTER OF APPLICATION NO 2593168

BY

MR KULDIP SINGH PALAK

TO REGISTER THE FOLLOWING SERIES OF FOUR TRADE MARKS:



IN CLASSES 09 AND 25

AND

IN THE MATTER OF OPPOSITION THERETO

UNDER NO 102897

BY

SAYFA SYSTEMS UK

BACKGROUND

1) On 01 September 2011, Mr Kuldip Singh Palak ('the applicant') applied to register the series of four trade marks shown on the cover page of this decision in respect of the following goods:

Class 09: *Safety Helmets, hard hats, Eyewear, Visors, ear protectors against sound.*

Class 25: *Safety type clothing for head, face, body, hand and feet.*

2) The application was published on 14 October 2011 in the Trade Marks Journal and notice of opposition was subsequently filed by Sayfa Systems UK ('the opponent'). The opponent claims that the application offends under section 5(2)(b) of the Trade Marks Act 1994 ('the Act').

3) The opponent relies on a single UK trade mark, which is set out in the table below:

Mark details	Goods relied upon
UK trade mark no: 2569018 RHINO Filing date: 13 January 2011 Date of entry in the register: 29 April 2011	Class 9: <i>Industrial safety apparatus for the protection of workers against accidents; fall prevention and fall arresting safety apparatus; safety rope systems for persons working at heights; safety harnesses; safety clothing, footwear and headgear for protection against accident or injury.</i>

4) The opponent's mark has completed its registration procedure; it is an earlier mark in accordance with section 6 of the Act. Further, as it had been registered for less than five years prior to the publication date of the opposed trade mark, it is not subject to the proof of use conditions contained in section 6A of the Act.

5) The applicant filed a brief counterstatement in which it stated:

"The facts alleged in the Opponent's grounds of opposition are denied.

The Opponent is put to strict proof of all matters alleged."

6) Neither party filed evidence; the applicant did however file written submissions during the evidential rounds. Only the opponent filed written submissions in lieu of a hearing. I now make this decision based on the papers before me giving full consideration to all of the parties' submissions and making reference to the same as, and when, appropriate.

DECISION

Section 5(2)(b)

7) This section of the Act states:

“5. (2) A trade mark shall not be registered if because –

(a)

(b) it is similar to an earlier trade mark and is to be registered for goods or services identical with or similar to those for which the earlier trade mark is protected,

there exists a likelihood of confusion on the part of the public, which includes the likelihood of association with the earlier trade mark.”

8) The leading authorities on the assessment of the likelihood of confusion under section 5(2)(b) of the Act are from the Court of Justice of the European Union (CJEU): *Sabel BV v Puma AG* [1998] RPC 199, *Canon Kabushiki Kaisha v Metro-Goldwyn-Mayer Inc* [1999] RPC 117, *Lloyd Schuhfabrik Meyer & Co GmbH v Klijsen Handel B.V.* [2000] F.S.R. 77, *Marca Mode CV v Adidas AG & Adidas Benelux BV* [2000] E.T.M.R. 723, *Medion AG v. Thomson Multimedia Sales Germany & Austria GmbH* C-120/04 and *Shaker di L. Laudato & C. Sas v Office for Harmonisation in the Internal Market (Trade Marks and Designs) (OHIM) C-334/05 P (LIMONCELLO)*. It is clear from these cases that:

(a) the likelihood of confusion must be appreciated globally, taking account of all relevant factors; *Sabel BV v Puma AG*,

(b) the matter must be judged through the eyes of the average consumer for the goods/services in question; *Sabel BV v Puma AG*, who is deemed to be reasonably well informed and reasonably circumspect and observant - but who rarely has the chance to make direct comparisons between marks and must instead rely upon the imperfect picture of them he has kept in his mind; *Lloyd Schuhfabrik Meyer & Co. GmbH v Klijsen Handel B.V.*,

(c) the average consumer normally perceives a mark as a whole and does not proceed to analyse its various details; *Sabel BV v Puma AG*,

(d) the visual, aural and conceptual similarities of the marks must therefore be assessed by reference to the overall impressions created by the marks bearing in mind their distinctive and dominant components; *Sabel BV v Puma AG*,

e) assessment of the similarity between two marks means more than taking just one component of a composite trade mark and comparing it with another mark; the comparison must be made by examining each of the marks in question as a whole, which does not mean that the overall impression conveyed to the relevant public by a composite trade mark may not, in certain

circumstances, be dominated by one or more of its components; *Medion AG v. Thomson Multimedia Sales Germany & Austria GmbH*,

f) it is only when all other components of a complex mark are negligible that it is permissible to make the comparison on the basis of the dominant element; *Shaker di L. Laudato & C. Sas v OHIM*,

(g) a lesser degree of similarity between the marks may be offset by a greater degree of similarity between the goods, and vice versa; *Canon Kabushiki Kaisha v Metro-Goldwyn-Mayer Inc*,

(h) there is a greater likelihood of confusion where the earlier mark has a highly distinctive character, either per se or because of the use that has been made of it; *Sabel BV v Puma AG*,

(i) in determining whether similarity between the goods or services covered by two trade marks is sufficient to give rise to the likelihood of confusion, the distinctive character and reputation of the earlier mark must be taken into account; *Canon Kabushiki Kaisha v Metro-Goldwyn-Mayer Inc*,

(j) mere association, in the sense that the later mark brings the earlier mark to mind, is not sufficient for the purposes of Section 5(2); *Sabel BV v Puma AG*,

(k) further, the reputation of a mark does not give grounds for presuming a likelihood of confusion simply because of a likelihood of association in the strict sense; *Marca Mode CV v Adidas AG and Adidas Benelux BV*,

(l) but if the association between the marks causes the public to wrongly believe that the respective goods come from the same or economically linked undertakings, there is a likelihood of confusion within the meaning of the section; *Canon Kabushiki Kaisha v Metro-Goldwyn-Mayer Inc*.

Comparison of goods

9) The goods to be compared are:

Opponent's goods	Applicant's goods
Class 9: Industrial safety apparatus for the protection of workers against accidents; fall prevention and fall arresting safety apparatus; safety rope systems for persons working at heights; safety harnesses; safety clothing, footwear and headgear for protection against accident or injury.	Class 09: Safety Helmets, hard hats, Eyewear, Visors, ear protectors against sound. Class 25: Safety type clothing for head, face, body, hand and feet.

10) The leading authorities as regards determining similarity between goods and services are considered to be *British Sugar Plc v James Robertson & Sons Ltd* ('*Treat*') [1996] R.P.C. 281 and *Canon Kabushiki Kaisha v. Metro-Goldwyn-Mayer* [1999] R.P.C. 117 ('*Canon*'). In the latter case, the CJEU accepted that all relevant factors should be taken into account including the nature of the goods/services, their intended purpose, their method of use and whether they are in competition with each other or are complementary. The criteria identified in the *Treat* case were:

- (a) The respective uses of the respective goods or services;
- (b) The respective users of the respective goods or services;
- (c) The physical nature of the goods or acts of service;
- (d) The respective trade channels through which the goods or services reach the market;
- (e) In the case of self-serve consumer items, where in practice they are respectively found or likely to be found in supermarkets and in particular whether they are, or are likely to be, found on the same or different shelves;
- (f) The extent to which the respective goods or services are competitive.

11) In *Beautimatic International Ltd v. Mitchell International Pharmaceuticals Ltd and Another* ('*Beautimatic*') [2000] FSR 267 Neuberger J held that the words must be given their natural meaning, subject to their being construed within their context; they must not be given 'an unnaturally narrow meaning simply because registration under the 1994 Act bestows a monopoly on the proprietor'.

12) Further, in *YouView TV Ltd v Total Ltd* ('*YouView*') [2012] EWHC 3158 (Ch) at [12] Floyd J said:

"... Trade mark registrations should not be allowed such a liberal interpretation that their limits become fuzzy and imprecise: see the observations of the CJEU in Case C-307/10 *The Chartered Institute of Patent Attorneys (Trademarks) (IP TRANSLATOR)* [2012] ETMR 42 at [47]-[49]. Nevertheless the principle should not be taken too far. *Treat* was decided the way it was because the ordinary and natural, or core, meaning of 'dessert sauce' did not include jam, or because the ordinary and natural description of jam was not 'a dessert sauce'. Each involved a straining of the relevant language, which is incorrect. Where words or phrases in their ordinary and natural meaning are apt to cover the category of goods in question, there is equally no justification for straining the language unnaturally so as to produce a narrow meaning which does not cover the goods in question."

13) Whether goods/services are complementary (one of the factors referred to in *Canon Kabushiki Kaisha v. Metro-Goldwyn-Mayer*), will depend on whether there exists a close connection or relationship such that one is important or indispensable for the use of the other. In *Boston Scientific Ltd v Office for Harmonization in the*

Internal Market (Trade Marks and Designs) (OHIM) ('Boston Scientific') Case T-325/06 it was stated:

“It is true that goods are complementary if there is a close connection between them, in the sense that one is indispensable or important for the use of the other in such a way that customers may think that the responsibility for those goods lies with the same undertaking (see, to that effect, Case T-169/03 Sergio Rossi v OHIM – Sissi Rossi (SISSI ROSSI) [2005] ECR II-685, paragraph 60, upheld on appeal in Case C-214/05 P Rossi v OHIM [2006] ECR I-7057; Case T-364/05 Saint-Gobain Pam v OHIM – Propamsa (PAM PLUVIAL) [2007] ECR II-757, paragraph 94; and Case T-443/05 El Corte Inglés v OHIM – Bolaños Sabri (PiraÑAM diseño original Juan Bolaños) [2007] ECR I-0000, paragraph 48).”

On the matter of complementarity, I also bear in mind the comments of Mr Daniel Alexander QC, sitting as the appointed person, in *Sandra Amalia Mary Elliott v LRC Products Limited* BL O/214/13.

14) As regards when goods can be considered identical, I note the decision of the General Court in *Gérard Meric v OHIM*, Case T-133/05 (*'Meric'*) where it held:

“29 In addition, the goods can be considered as identical when the goods designated by the earlier mark are included in a more general category, designated by the trade mark application (Case T-388/00 Institut für Lernsysteme v OHIM – Educational Services (ELS) [2002] ECR II-4301, paragraph 53) or when the goods designated by the trade mark application are included in a more general category designated by the earlier mark (Case T-104/01 Oberhauser v OHIM – Petit Liberto (Fifties) [2002] ECR II-4359, paragraphs 32 and 33; Case T-110/01 Vedial v OHIM – France Distribution (HUBERT) [2002] ECR II-5275, paragraphs 43 and 44; and Case T-10/03 Koubi v OHIM – Flabesa (CONFORFLEX) [2004] ECR II-719, paragraphs 41 and 42).”

15) The opponent claims that the respective goods are identical or, at least, highly similar. The applicant's submissions on this point are set out in full below:

“The Application ... has been applied for with goods that are worn by a person.

The Registration ... is protected for safety structures used to prevent or break the fall of a person.

The difference in how the goods are used is significant, and would commonly be manufactured, distributed, and used by different people and in different circumstances.

Furthermore, the price points of the respective products are very different, as the Applicant's products are single-unit pieces of small equipment, while the Opponent's are large industrial-sized installations.”

16) I will deal firstly with the applicant's goods in class 09. Contrary to the applicant's assertion, the opponent's specification is not limited to 'safety structures used to prevent or break the fall of a person' nor is it limited to 'large industrial - sized installations'. The applicant's term 'Safety Helmets, hard hats, Visors' would all be encompassed by the opponent's 'safety headgear for protection against accident or injury'. The respective goods are identical in accordance with *Meric*.

17) The applicant's 'Eyewear' would include safety glasses, safety goggles and the like for protection against accident or injury to the eyes. There is similarity in purpose between this kind of eyewear and the opponent's 'safety clothing, footwear and headgear for protection against accident or injury' as the competing goods are all items worn on the person to prevent injury. Further, they are likely to share trade channels and may have the same users. For the same reasons, there is also similarity with the applicant's 'ear protectors against sound'. There is a good degree of similarity between the applicant's 'Eyewear' (insofar as it includes 'safety eyewear for protection against accident and injury'), 'ear protectors against sound' and the opponent's 'safety clothing, footwear and headgear for protection against accident or injury'. As regards 'eyewear', I say 'insofar as' since the term eyewear would also cover other kinds of eyewear such as spectacles for correcting defective vision but which would not, in my view, share any similarity with any of the opponent's goods.

18) Turning to the applicant's goods in class 25, I remind myself that it is permissible to take into account the class number specified by the applicant when assessing the meaning of the description of goods included in the application.¹ Bearing this in mind, the applicant's term, within the context of class 25, would cover items intended to protect the wearer's clothing (rather than those intended to protect against injury) i.e. overalls, coveralls, over-trousers, over-jackets and workmen's aprons. Such goods are, like the opponent's 'safety clothing, footwear and headgear for protection against accident or injury', all worn on the person. They all have a protective function, albeit that the opponent's goods have the primary purpose of protecting the individual from harm or injury rather than to protect their clothing. All may be collectively described as work-wear and may share trade channels and have the same users. I find that the applicant's goods in class 25 are reasonably similar to the opponent's 'safety clothing, footwear and headgear for protection against accident or injury'.

Average consumer and the purchasing process

19) It is necessary to consider these matters from the perspective of the average consumer of the goods at issue (*Sabel BV v. Puma AG*). The average consumer is deemed to be reasonably well informed and reasonably observant and circumspect, but his/her level of attention is likely to vary according to the category of goods.

20) On the identity of the average consumer, the opponent states:

"They are those that need safety apparatus, they may be a member of a household wanting safety clothing headgear and footwear for use while operating a chainsaw or other heavy machinery in the garden, the home

¹ *Altecnic Ltd's Trade Mark Application* [2002] RPC 34.

mechanic wanting protective clothing whilst welding repairs to their motor car, the jobbing builder who works in a hard hat environment, or who wants protective clothing, headwear and eye and ear wear to protect them use whilst conducting the task of building, drilling sawing sanding and using power tools the specialist welder or oil rig worker who cannot attend work without a full kit of protective clothing headgear and footwear, the purchaser for a company that needs to supply safety clothing, headwear and footwear to their staff.”

21) The applicant states:

“It is submitted that such safety equipment is purchased by two types of person. Either by the end user himself for use on his own person; or alternatively, by employers to ensure the safety of their employees and colleagues.

Given the nature of the goods and the significance of their function (to prevent personal injury and death), it is submitted in the strongest terms that the degree of attention of the consumer to the source of its products will be of the absolute highest importance.”

22) Both parties appear to agree, which accords with my own view, that the average consumer of the goods in the instant case is likely to consist both of professionals who work in hazardous environments and their employers. It is also possible, as suggested in the opponent’s submissions, that members of the public who wish to undertake activities in their personal time which involve elements of risk, may fall within the definition of the average consumer in this case. Turning to the degree of attention that is likely to be paid during the purchase of the competing goods, I bear in mind that their cost is likely to vary such that a pair of plastic safety goggles, for instance, may be very inexpensive (perhaps no more than a couple of pounds) whereas a pair of ear defenders designed to drown out all sound may bear a higher price tag. However, regardless of the exact cost of the goods, I would expect the degree of attention afforded during the purchase to be at least reasonable in all instances, given that the consumer may wish to inspect the items to ensure that they are fit for the exact safety purpose for which they are intended and, when purchased by the end user for their own personal use, they may also wish to ensure that the goods are of the correct size for their body or head etc., as the case may be. All of the goods are likely to be selected by the eye from retail establishments, websites or catalogues and therefore the visual aspect is likely to dominate during the purchasing act, but that is not to say that the aural aspect will be ignored from my considerations – this too will be given due weight.

Comparison of marks

23) The relevant marks to be compared are:

Opponent's mark	Applicant's marks
<p>RHINO</p>	

24) The average consumer normally perceives a mark as a whole and does not proceed to analyse its details. The visual, aural and conceptual similarities must therefore be assessed by reference to the overall impressions created by the marks, bearing in mind their distinctive and dominant components (*Sabel BV v. Puma AG*). Accordingly, there cannot be an artificial dissection of the marks, although, it is necessary to take into account any distinctive and dominant components.

25) The opponent's mark consists of the single word RHINO presented in plain block capitals. There are no dominant elements; the distinctiveness lies in the mark as a whole. The applicant's marks contain the same word, but presented in a stylised font in a prominent position above the word weld (also stylised) with the letter 'l' in the latter overlapping slightly with the former. The first of the applicant's marks also contains a black rectangular background. The most dominant and distinctive element of the marks is the stylised word 'RHINO'.

26) The opponent's earlier registration makes no claim to colour. Accordingly, the colours in the second and third of the applicant's marks is not a distinguishing factor. In *Specsavers International Healthcare Limited & Others v Asda Stores Limited* [2010] EWHC 2035 (Ch) Mann J stated:

'119. It is not clear to me that this is a debate which advances the case very much, but the position seems to me to be as follows. As a matter of principle the exercise involves comparing the offending sign with the registered mark and assessing the likelihood of confusion or association. The two things have to be compared. Since we live in a visual world, and signs are visual, some form of appearance has to be considered. If the registered mark is limited to a colour, then the mark that is used has to be compared, as used, to the mark that is registered, as registered (and therefore in colour). If the registered mark is unlimited as to colour then it is registered for all colours. This means that the colour of the offending sign becomes irrelevant. It will not be possible to say that its colour prevents there being an infringement. At this point one can take one of two courses, each of which ought to have the same result. The first is to imagine the registered mark in the same colour as the offending sign. The second is to drain the colour from the offending sign. Either way one then has the material for comparison. One could even imagine them both in a third colour. It does not matter. So in a sense both Mr Purvis and Mr Bloch are right. As a matter of visual convenience it seems to me to be easier to imagine the registered mark in a colour than to imagine the offending sign drained of colour, and I propose to adopt that course.'

Notwithstanding the presence of the stylised word 'weld' in the applicant's marks, which is absent from the opponent's mark, the commonality of word RHINO (albeit in different styles) results in a very good degree of visual similarity between the respective marks.

27) From an aural perspective, the applicant states:

"The word "weld" adds an extra syllable to the Mark (i.e. the Registration includes two syllables, whereas the Mark includes three), causing a 50% increase in syllable count.

We submit that the additional syllable is significant, especially when the Mark is spoken and heard."

The opponent's mark will be pronounced as RYE-NO and the applicant's marks as RYE-NO-WELLED. Clearly, as the applicant submits, its marks contain three syllables and the opponent's mark only two syllables; this is a point of difference. Nevertheless, and despite the applicant's contention that the third syllable in its mark is 'significant', its presence does not detract from the fact that the first two syllables of the applicant's marks and the only two syllables in the opponent's mark are identical. On account of this, I find there to be a very good degree of aural similarity.

28) Conceptually, the word RHINO is likely to conjure the image of the well known horned mammal i.e. a rhinoceros. This concept is shared by the respective marks. The applicant's mark also contains the additional concept evoked by the word 'weld' which will likely bring to mind the act of fusing metals together. Despite this point of difference, I find that the consistency of the rhinoceros concept results in a high degree of conceptual similarity between the marks.

Distinctive character of the earlier mark

29) I must consider the distinctive character of the earlier mark. The distinctive character of a trade mark must be assessed by reference to the goods or services for which it is registered and by reference to the way it is perceived by the relevant public (*Rewe Zentral AG v OHIM (LITE)* Case T-79/00 [2002] ETMR 91).

30) The opponent submits:

“In this case RHINO is neither in any way descriptive nor allusive for any of the goods of the registration, and as such it has a greater capacity to identify the goods for which it is registered and so enjoys a good deal of inherent distinctiveness.”

31) The applicant states:

“We submit that the current use, in the UK, of the word “RHINO” should be considered when establishing the distinctiveness of the word as a trade mark.

There are many UK and CTM trade mark applications and registrations that include the word “RHINO”. By way of example, we have enclosed some registrations in Annex 1 (some 18 registrations, even though we have limited the selection to Class 9).

We submit that the wide use and registration of the word “RHINO” dilutes the distinctiveness of the word as a trade mark. Although it is not submitted that the Registration is descriptive in relation to the goods concerned, neither is the word distinctive. The state of the register confirmed this.”

32) The applicant’s contention does not assist it for the reasons given by the General Court in *Zero Industry Srl v OHIM* – T-400/06 where it stated:

“73. As regards the results of the research submitted by the applicant, according to which 93 Community trade marks are made up of or include the word ‘zero’, it should be pointed out that the Opposition Division found, in that regard, that ‘... there are no indications as to how many of such trade marks are effectively used in the market’. The applicant did not dispute that finding before the Board of Appeal but none the less reverted to the issue of that evidence in its application lodged at the Court. It must be found that the mere fact that a number of trade marks relating to the goods at issue contain the word ‘zero’ is not enough to establish that the distinctive character of that element has been weakened because of its frequent use in the field concerned (see, by analogy, Case T-135/04 *GfK v OHIM – BUS(Online Bus)* [2005] ECR II-4865, paragraph 68, and Case T-29/04 *Castellblanch v OHIM – Champagne Roederer (CRISTAL CASTELLBLANCH)* [2005] ECR II-5309, paragraph 71).”

33) I agree with the opponent. The word “RHINO” is not, as far as I am aware, descriptive or allusive of the goods covered by its registration and I see no reason to

attribute the mark with anything less than a good degree of inherent distinctive character.

Likelihood of confusion

34) In approaching the likelihood of confusion, I remind myself that I must keep in mind the following factors:

- i) the interdependency principle, whereby a lesser degree of similarity between the goods may be offset by a greater similarity between the marks, and vice versa (*Canon Kabushiki Kaisha v Metro-Goldwyn-Mayer Inc*);
- ii) the factor of imperfect recollection i.e. that consumers rarely have the opportunity to compare marks side by side but must rather rely on the imperfect picture that they have kept in their mind (*Lloyd Schuhfabrik Meyer & Co. GmbH v. Klijsen Handel B.V*), and;
- iii) the principle that the more distinctive the opponent's mark is, the greater is the likelihood of confusion (*Sabel BV v Puma AG*).

35) I have found that 'eyewear', insofar as it covers safety eyewear for the protection against accident and injury, and 'ear protectors against sound' are similar to a good degree to the opponent's goods. The applicant's 'Safety Helmets, hard hats, Visors' are identical to the opponent's goods. In relation to the applicant's goods in class 25, I have found these to be reasonably similar to the opponent's goods. The average consumer is likely to consist of individuals who work in hazardous environments, employers in those fields of industry and possibly members of the public who wish to undertake activities in their personal time which involve elements of risk. The level of attention likely to be paid during the purchase for all of the respective goods is likely to be at least reasonable and the purchase will be mainly visual although aural considerations are not disregarded. As regards the marks themselves, I have found that they share a very good degree of visual and aural similarity and a high degree of conceptual similarity. I have also found that the earlier mark is possessed of a good degree of inherent distinctive character.

36) Drawing together all of the above findings and weighing them against each other, I come to the conclusion that the similarities between the marks outweigh the differences and this, together with the degree of similarity and identity that exists between the respective goods and, having regard for the good degree of distinctive character of the earlier mark, results in a likelihood of confusion.

37) As regards the opponent's broad term 'eyewear' insofar as it does not include safety eyewear for the protection against accident and injury I have found no similarity with the opponent's goods. There cannot be a likelihood of confusion in respect of those goods.² In light of this, I have considered the guidance in Tribunal Practice Notice ('TPN') 1/2012 on the matter of partial refusal of a broad term. I note that the relevant TPN states, inter alia, the following:

² *Waterford Wedgwood plc v OHIM* – C-398/07 P

“Conversely, where an opposition or invalidation action is successful against a range of goods/services covered by a broad term or terms, it may be considered disproportionate to embark on formulating proposals which are unlikely to result in a narrower specification of any substance or cover the goods or services provided by the owner’s business, as indicated by the evidence. In these circumstances, the trade mark will simply be refused or invalidated for the broad term(s) caught by the ground(s) for refusal.”

38) Although no evidence has been filed, the applicant’s submissions make clear that its goods are “in the nature of protective equipment worn on the person”. In the light of this, I do not consider it would serve any purpose to narrow the term ‘eyewear’ to specific kinds of eyewear for which no likelihood of confusion exists but which appear to be of no interest to the applicant. Taking a pragmatic approach, the whole broad term ‘eyewear’ is therefore refused.

39) The ground of opposition under section 5(2)(b) of the Act succeeds in full.

COSTS

40) As the opponent has been successful, it is entitled to an award of costs. I award costs to the opponent on the following basis:

Preparing notice of opposition	£200
Opposition fee	£200
Written submissions	£300
Total:	£700

41) I order Mr Kuldip Singh Palak to pay Sayfa Systems UK the sum of **£700**. This sum is to be paid within seven days of the expiry of the appeal period or within seven days of the final determination of this case if any appeal against this decision is unsuccessful.

Dated this 2nd day of July 2014

**Beverley Hedley
For the Registrar,
the Comptroller-General**