IN THE MATTER OF Application No 2016292 by Dolland & Aitchison Limited to register a trade mark in Class 9

AND

IN THE MATTER OF Opposition thereto under No 43573 by Polaroid Corporation

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BACKGROUND

On 31 March 1995, Dolland & Aitchison Group (Holdings) Ltd applied to register the trade mark POLACLIP in Class 9 in respect of:

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Lenses; spectacles; sunglasses and clip on sunglasses; spectacle frames, spectacle cases, spectacle chains, contact lenses and cases therefore.

On the 28 November 1995, Polaroid Corporation filed notice of opposition. The grounds of opposition are, in summary, as follows:-

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1. Polaroid Corporation are the proprietors of a number of registrations of trade marks comprising or containing the word POLAROID (details of these registrations are set out in Annex A). These marks have been used extensively by the opponents in the United Kingdom and are distinctive of the opponents' goods as a result of such use.

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2. The trade mark POLACLIP which the applicants are seeking to register is so similar to the opponents' marks and is applied for in respect of similar goods so that there exists a likelihood of confusion on the part of the public and a likelihood of association with the opponents' registered trade marks. Registration of the

mark applied for would therefore be contrary to Section 5 of the Trade Marks Act 1994.

- The trade mark POLACLIP so nearly resembles the opponents' registered marks
 that use of it would be likely to deceive or cause confusion and would be
 disentitled to protection in the Court of Justice.
- 4. The application should be refused in the exercise of the Registrar's discretion.
- The applicants' admit that the opponents are the proprietors of the marks listed in their Notice of Opposition, but they deny all the other grounds of opposition. Both sides ask for an award of costs.

The matter came to be heard on 11 June 1998 when the applicants were represented by Mr Blum of Gill Jennings & Every, Trade Marks Agents, and the opponents were represented by Ms D MacFarland of Counsel instructed by Stephenson and Schulman, Trade Marks Agents.

OPPONENTS' EVIDENCE

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- The opponents' evidence consists of a Statutory Declaration dated 12 August 1996 by
 Richard F deLima, who is the Vice President, Secretary and General Counsel of Polaroid
 Corporation. The most relevant aspects of Mr deLima evidence are set out in the following extracts:
- "As early as 1938 ophthalmic products were being produced under the Polaroid trade mark and a UK representative, Mr Meakin, was appointed by Polaroid. An application for POLAROID was filed in the UK in 1939 in Class 9 by Polaroid under number 608812 for 'Materials specially prepared for use in the polarisation of light'."
- 30 "From a worldwide perspective Polariod, the Trade Mark and the trade name, are exceptionally well known deriving from instant photography and optical products and

because of the enormous commercial success Polariod has had in marketing its pioneering technological products and because of the extent to which Polariod is committed to advertising its products. For the years 1991-1995 inclusive annual sales of Polaroid products were in excess of US \$2 billion."

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"Since Polaroid's founding in 1937 up to 1995 a total sum of well in excess of US \$100 million had been spent worldwide directly on advertising Polaroid's products."

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"Polaroid is the owner of numerous trade mark registrations in the UK, and in particular in Class 9 there are eleven registered mark comprising of or including POLAROID which have specifications including interalia sunglasses, optical apparatus and eye glasses."

"When introducing new products Polaroid seeks to use its trade mark and trade name

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POLAROID or where appropriate to create a new mark incorporating the POLA root to create a specific image for the new product. In this way products achieve instant recognition as being made by Polaroid. Polaroid owns many UK trade mark registrations derived from the POLA root. For instance in Class 9 POLATRONIC (1072900), POLAPRINTER (1138222), POLAPULSE (1072899), POLASONIC (1112828) and POLABLUE, POLACHROME, POLACURE, POLALINE, POLACOLOR,

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POLAPROOF and POLATHANE in other classes."

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"Up to in 1984 Polaroid's UK subsidiary Polaroid (UK) Limited acted as distributor for sales of Polaroid sunglasses and clip-on sunglasses in the United Kingdom. Distributorship then passed to a company called Croftons from 1984 to 1987. Unfortunately that company is no longer trading, and we have been unable to obtain sales information from that company's records. The figures shown represent Polaroid's sales figures to Croftons rather than their sales to the trader. Since 1987 distribution has been through Visions (Young Optical). Sales from 1982 to present of Polaroid sunglasses and clip-on sunglasses in the United Kingdom are in excess of £7,000,000."

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Contrary to what is suggested, Mr deLima in fact provides no further information about the volume of sales of sunglasses under the mark POLAROID than stated in the above extract. There is no breakdown of annual sales figures. Mr deLima continues:

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"In 1987, 1988 and 1989 Polaroid sold a Clip Range of clip-on sunglasses. The original 1987 brochure and copies of the pages from the brochures displaying the ranges from the other years are reproduced and shown to me marked RFdL3. It will be seen that in 1987 and 1988 specific reference was made to Polaroid Clips and that the mark POLAROID was used in close proximity to the term Clip Range in 1988 and 1989. There is now produced and shown to me marked RFdL4 an up to date brochure from Polaroid showing sunglasses and clip-on sunglasses. The insert for the brochure refers to Clip-Ons adjacent to the POLAROID trade mark and there is also reference in the brochure to the Polaroid Clip Display Promotion Pack."

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The opponents' evidence also includes a Statutory Declaration dated 4 November 1996 by Philip Malivoire, who is an associate Director at N O P Consumer Market Research. Mr Malivoire states that he was commissioned by Polaroid Corporation to design and execute a survey in order to establish consumers associations with sunglasses sold under the brand name POLACLIP. He gives the following explanation as to how the survey was conducted:

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"The sample for the survey comprised persons who wear glasses. As the survey was conducted in the street, interviewers were asked, simply, to attempt to interview every person they saw wearing glasses. In addition to this quotas were set and achieved, in order that we interviewed a broad cross-section of persons in different age and social groups, and similar numbers of men and women. Each of the interviewers was briefed with written briefing notes and telephoned by myself to ensure that all elements of the project were properly understood. In particular I clarified the pronunciation of "Polaclip" to ensure that all persons conducting the survey would similarly pronounce it POLA-KLIP.

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The questionnaire comprised only one question: "Who do you think would sell sunglasses

under the brand name Polaclip." Interviewers were instructed to probe respondents for further details wherever they believed they had been given an answer that was imprecise, incomplete, or where the answer might be difficult to interpret. All questionnaires were signed by the respondent to confirm that the answers were an accurate representation of the answers they had given and all respondents were asked if they were willing to speak to a legal representative. In accordance with all market research surveys, the questionnaire was signed by the interviewer.

As we could identify no product in the market bearing the name POLACLIP, no visual stimulus material was used. Instead interviewers read out the brand name POLACLIP to respondents.

True copies of the key survey documents/the questionnaire, interviewer instructions and the quote sheet are exhibited as PM1 to this Declaration. Interviewing was conducted on 26 and 27 July 1996 in Southend Essex, Street Somerset and Bridlington Yorkshire. A total of 91 was completed."

The results of the survey indicate that 35 persons said they did not know or had no idea who might sell sunglasses under the mark. 31 persons mentioned Boots the Chemist, and 17 persons mentioned Polaroid, 6 of these mentioned other names as well, 1 of these 6 also mentioned Fosters and Grants.

APPLICANTS' EVIDENCE

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The applicants' evidence consists of a Statutory Declaration dated 9 April 1997 by John Christopher Humphreys who is a Director of Dolland and Aitchison Limited. Mr Humphreys says that his company is the market leader in opticians goods and services. He further states that all of his company's goods are sold through branches of their stores and nowhere else. He says that, in 1987, Dolland and Aitchison Limited started to use the trade mark POLACLIP for clip-on sun spectacles, and that the number of such goods sold under the trade mark POLACLIP since 1987 has been about 24,000 a year. Mr Humphreys states that the applicants' product utilise a method

whereby the lenses "polarise" light, and that the mark was chosen to allude to this "polarising" effect.

Exhibit JCH1 to Mr Humphreys declaration consists of a copy of a sign promoting the applicants' goods. The mark POLACLIP is shown with the word appearing on a black and white rectangular background with the word POLA in white letters on a black background and the word CLIP in black letters on a white background. Mr Humphreys goes on to take issue with the conduct and results of the survey conducted on behalf of the opponents. In particular, he notes that no sworn declarations have been lodged from any of the respondents and he says that it is therefore impossible to investigate what reasoning lay behind the replies given. Mr Humphreys also notes that without sworn evidence from the respondents, the results of the survey are hearsay. Finally, Mr Humphreys states that although his company has been using the trade mark POLACLIP since 1987, no instances of confusion with any other trade mark or with the Polaroid Corporation has come to light. He notes that no instances of confusion are brought up by the opponents either.

OPPONENTS' EVIDENCE IN REPLY

The opponents filed further evidence in reply. This takes the form of a second Statutory Declaration by Philip Malivoire dated 20 October 1997. Most of Mr Malivoire's second declaration consists of a response to Mr Humphreys' criticisms of the survey evidence contained in his first declaration. I do not intend to summarise his evidence in detail. I note that Mr Malivoire points out that contemporaneous records of the survey were made and were available to lawyers. He says that to the rest of his knowledge and belief no-one has requested disclosure or discovery of such documents, and that he would have expected the applicants and their lawyers to have made such a request before lodging their reply evidence. The opponents reply evidence also includes a Statutory Declaration dated 13 October 1997 by Julie Petrini, who is a Trade Mark Counsel employed by the opponents. Much of this declaration consists of legal argument which I do not intend to summarise here. However, I note that exhibit JP1 to Miss Petrini's declaration consists of a bundle of product packages and related material which she says show use of other trade marks used by the opponents in the United States, the United Kingdom and other countries,

which consist of the word POLA in combination with other elements. These marks include POLAVIEW, POLAPULSE, POLACOLOR and POLAGRAPH. These marks appear on packaging used for photographic film, projectors and lights. There is no evidence that any of these marks, or any other mark other than POLAROID, have been used on sunglasses or spectacles. Nor is there any specific evidence that the marks previously mentioned have been used in the United Kingdom on any goods before the date of the application under opposition.

DECISION

The opponents ask for the Registrar to refuse the application in the exercise of his discretion. However, under the Registrar has no power under the 1994 Act to refuse a trade mark which meets the requirements for registration. Consequently. I need say no more about this ground of opposition. For reasons which I will explain later in this decision, I intend to take account of the recognition of the opponents' registered trade marks on the market in deciding the matter under Section 5(2) of the Act. On that footing, I understood Ms MacFarland to accept that the opponents' case under Section 5(4) stood or fell together with their case under Section 5(2). In practice therefore, I need only consider the ground of opposition under Section 5(2) of the Act.

Section 5(2) is as follows:-

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A trade mark shall not be registered if because-

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

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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

30 association with the earlier trade mark.

The opponents rely upon 12 registrations of trade marks in their name which consist of or include the word POLAROID. All of these registrations are in Class 9 and cover optical apparatus. Most cover identical goods to the application in suit. These registrations qualify as 'earlier trade marks' within the meaning of Section 6(1) of the Act. The opponents' evidence contains a number of references to other marks with the prefix POLA- which they claim are registered in their name. However, these marks were not included in the pleadings in the notice of opposition. They do not appear to be registered for the goods at issue and there is no evidence that they have been used in the UK prior to the date of the application under opposition. Consequently, I need only decide whether POLACLIP is sufficiently similar to POLAROID so that when used on identical goods there exists a likelihood of confusion, including the likelihood of association. In this connection, Ms MacFarland invited me to adopt a modified version of the well known tests under the previous legislation as set out in Smith Hayden & Co's application (1946) 63 RPC 97 as adapted by Lord Upjohn in Bali trade mark case 1969 RPC 472.

It appears to me that when one is seeking to apply a new law based upon an EC Directive - 104/89 - one needs to exercise care about importing tests used to apply the previous domestic legislation. Even if a provision of the new law appears similar to a provision of the old law it would not be safe to assume that was intended to have, or does have, the same effect. Consequently, I propose instead to follow the approach adopted by the European Court of Justice (ECJ) in *Sabel v Puma* 1998 RPC p199. The Court considered the meaning of Article 4(1)(b) of the aforementioned Directive (which is identical to Section 5(2) of the Act) and stated that:-

".....it is clear from the tenth recital in the preamble to the Directive that the appreciation of the likelihood of confusion 'depends on numerous elements and, in particular, on the recognition of the trade mark on the market, of the association which can be made with the used or registered sign, of the degree of similarity between the trade mark and the sign and between the goods or services identified'. The likelihood of confusion must therefore be appreciated globally, taking into account all factors relevant to the circumstances of the case.

That global appreciation of the visual, aural or conceptual similarity of the marks in question, must be based on the overall impression given by the marks, bearing in mind, in particular, their distinctive and dominant components. The wording of Article 4(1)(b) of the Directive - 'there exists a likelihood of confusion on the part of the public....' - shows that the perception of marks in the mind of the average consumer of the type of goods or services in question plays a decisive role in the global appreciation of the likelihood of confusion. The average consumer normally perceives a mark as a whole and does not proceed to analyse its various details.

In that perspective, the more distinctive the earlier mark, the greater will be the likelihood of confusion. It is therefore not impossible that the conceptual similarity resulting from the fact that two marks use images with analogous semantic content may give rise to a likelihood of confusion where the earlier mark has a particularly distinctive character, either per se or because of the reputation it enjoys with the public."

The opponents place reliance on the results of the public survey described above. On its face this appears to show that, in answer to the question "Who do you think would sell sunglasses under the brand name POLACLIP?", 17 out of 91 respondents mentioned the opponents. Mr Humphreys evidence, for the applicants, contains criticisms of the survey evidence and, in particular, points out that none of the respondents have submitted declarations in these proceedings. Mr Blum for the applicants did not challenge the admissibility of the survey evidence at the hearing, but he made various criticisms of it which go to the weight to be attached to it.

It is always possible to criticise survey evidence, but in this case the evidence does appear to me to be open to a number of serious failings. Firstly, I note that the respondents were not shown the mark applied for. It was read out to them as POLA-KLIP. This assumes that the respondents would themselves have come to this pronunciation. Further, depending upon the degree of separation given to the two elements, this approach could be open to the charge that it gives more emphasise to the common POLA- prefix that is apparent from the mark applied for. Perhaps more significantly, the question asked appears to have resulted in the respondents guessing as to the "right" answer in a speculative fashion. It is difficult to see any other explanation for 'Boots

the Chemist' being the most popular answer. This is underlined by the fact that 6 of the 17 persons mentioning POLAROID also mentioned other names. It appears to me that the question asked is of the type frowned upon by Mr Justice Whitford in the Raffles trade mark case (1984 RPC P 293) as likely to lead to artificial speculation. In that case Whitford J. also stressed the need for exact answers to questions to be recorded rather than some abbreviation. The opponents' advisors appear to have recognised this requirement because the 'Notes for Interviewers' included in exhibit PM1 to Mr Malivoire's first declaration gives the following instructions:-

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"Write down exactly what the respondent says, verbatim (unless pre-codes have been provided)."

"When you probe, write down everything you say, in brackets, not just (P) (Prompt)"

There is no evidence that pre-codes were used here. In response to Mr Humphreys' criticisms of the survey evidence, Mr Malivoire states in his second declaration that contemporaneous records were taken but that it is up to the applicants to seek disclosure or discovery of these documents, which is also the position Ms MacFarland took at the hearing. However, it is the opponents who wish to see weight given to this evidence. In those circumstances I think there is an onus upon them to provide sufficient information to support the "headline" results of the survey and to demonstrate that the survey was conducted properly and fairly. Where the survey is relatively crude, consisting of a single question and unspecified "prompts", I think it is particularly important for verbatim records to be submitted with the evidence. For otherwise one is left struggling to understand what the respondents really meant by the answer(s) attributed to them. The opponents had a chance to rectify this omission in response to Mr Humphreys' evidence. They chose not to do so. In the light of this and the other failings mentioned above, I do not consider that it would be safe for me to place any reliance on the results of the survey in assessing the likelihood of confusion between POLAROID and POLACLIP.

The applicants state that they have used the mark POLACLIP on clip-on sunglasses since 1987. They claim to have sold around £24k worth of sunglasses under the mark per annum, although they have not provided exact figures or an annual breakdown. The applicants say that they are

not aware of any confusion arising as a result of such use and ask me to accept this as a guide as to the absence of any likelihood of confusion in the future. The opponents point out that the applicants do not appear to have sold or promoted goods under their mark, other than through branches of their own stores. In these circumstances, they submit, past use is not a reliable guide as to the likelihood of confusion in the future. I think that the opponents are right about this. If POLACLIP is registered the applicants will not be restricted to using their mark in the manner that it appears to have been used to date. It therefore appears to me that I should consider all normal and fair use of the applicants' mark in assessing the likelihood of confusion. That would include placing the goods on the market in circumstances where POLACLIP and POLAROID sunglasses etc are on sale side by side.

It is clear from the above extract from *Sabel v Puma* that, in assessing the likelihood of confusion under Section 5(2)(b) of the Act, I should have regard to the recognition of the earlier mark on the market. The opponents claim to have sold over £7m worth of sunglasses under their mark in the UK between 1982 and 1996. Somewhat surprisingly, they have not provided an annual breakdown of those sales. They also claim to have spent over \$100m on worldwide promotion of the POLAROID mark between 1937 and 1995, although again it is not clear what proportion of this promotion of the mark has been in the UK. However, I think it is clear from the evidence that POLAROID is a long established trade mark in the UK, and that a substantial number of sunglasses have been sold under that mark before the date of the application in suit. The result of the public survey conducted by the opponents at least confirms that POLAROID is known to a significant proportion of the UK public. I don't think there is enough evidence before me to clearly establish that POLAROID is "well known" in the UK for sunglasses, but I consider that the opponents have established that the mark has a significant degree of recognition on the market. I don't think the applicants really dispute this

Taking this into account, I turn to consider whether because of the identity of the goods and the similarity of the marks there exists a likelihood of confusion, including the likelihood of association. It is often said that when comparing word marks the beginnings of the marks are most important. However, it is clear from *Sabel v Puma* that marks must be compared as wholes and it is the overall degree of resemblance and the likelihood of confusion which must be considered.

Although the marks share a common prefix (POLA) the endings of the marks are completely different resulting in marks that look significantly different to the eye. The endings of words are sometimes slurred or swallowed in speech, but the ending of POLACLIP appears unlikely to be lost in this way. I cannot envisage any circumstances where POLACLIP is likely to be misheard as POLAROID. Even allowing for imperfect recollection, I do not think that it is likely that members of the relevant public will confuse one mark for the other. Indeed the opponents main case, as I understand it, is not so much that the public will directly confuse the marks, but rather that because of the their reputation, the common prefix POLA and descriptive nature of CLIP (for clip on sunglasses), the public will regard the applicants' mark as a shortening of POLAROID clip-on sunglasses, and thus there will be an association as to origin.

In support of this contention Ms MacFarland cited the case of *Ravenshead Brick Co Ltd v Ruabon Brick & Terra Cotta Ltd* (1937) 54 RPC 341 where the use of SANRUS on bricks was held to be an infringement of the registered trade mark RUS (also for bricks). I note the similarity, although I think it also fair to note that, unlike POLACLIP, the mark SANRUS included the whole of the earlier mark (RUS), and that there was convincing evidence that persons familiar with RUS bricks thought SANRUS bricks were a "sand faced" version from the same manufacturer.

As the ECJ stated in *Puma v Sabel*, the public normally perceive trade marks as wholes and do not proceed to analyse the various details. That suggests that the opponents' claim, that the public regard the prefix of their mark - POLA - as itself distinctive of their goods, should be treated with caution. However, I must also bear in mind the ECJ's further observation in *Sabel v Puma*, that the more distinctive the earlier mark the greater will be the risk of confusion. Where the earlier mark has a particular reputation (as I have already found the opponents' mark has in relation to sunglasses), it is more likely that factors such as a common distinctive prefix in another word mark may cause the public to wonder whether there is some sort of connection in trade, even if there are significant differences between the words as wholes. No doubt there may be circumstances where the same could apply to distinctive suffix, see *Wagamama* trade mark case (1995 FSR 713). Of course, every case turns on its own facts.

For their part, the applicants point out that the prefix POLA is not artificial. Apart from being the beginning of the mark POLAROID, it is also the beginning of the dictionary words "polarise" and "polarising". It is common ground that these words describe the method used in many sunglasses to reduce glare and the harmful effects of the sun whilst retaining good visibility. In these circumstances the applicants say that, if the public stop to consider the matter at all, they are more likely to take their mark as an allusion to polarising clip-on sunglasses than a shortened form of

POLAROID clip-on sunglasses, as the opponents contend.

It appears to me from the promotional material contained in the opponents' evidence, that the relevant public are likely to be aware that "polarise" and "polarising" are words which describe a method used to reduce glare in sunglasses. Examples of the material I have in mind are attached to this decision as annex "B". In these circumstances I believe that I should only accept the opponents' claim that the public will take the POLA in POLACLIP as a reference to POLAROID on the basis of clear evidence. As I have already found, there is no such evidence before me. In the result the opposition fails.

The opposition having failed the applicants are entitled to a contribution towards their costs. I order the opponents to pay the applicants the sum of £700.

Dated this 16 Day of July 1998

Allan James

For the Registrar

25 The Comptroller General

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15:06:25 16 AUG 1996		Sunglasses. 68 Scientific and electrical apparatus and instruments, coin or counter-feed apparatus, all included in Class 9; surveying, photographic, cinematographic, optical, measuring, signalling and teaching apparatus and instruments; talking machines; and parts and fittings included in Class of the all the stocked			variable density viewing devices for optical purposes; and cases for cameras; but not including lenses or any goods of the same description as lenses. On Photographic, cinematographic and optical apparatus and instruments; photographic cameras; electronic photographic flash apparatus; parts and fittings for all the aforesaid goods; all included in class 9.	"41 Optical apparatus and instruments and parts thereof included in Class 9; sunglasses and spectacles, and optical lenses for use therewith. 105 Photographic and optical apparatus and		apparatus and instruments and parts and fitting included in Class 9 for all the aforesaid goods. 16 Sunglasses and eyeglasses and lenses for eyeglasses.
	. Journal Reference	13/06/1978 5302/684 14/11/1977 5230/2468	12\11\1973 5019/2215 18\08\1939 3245/562	19\04\1950 3834/1071	10\03\1994 6053/7603	19/11/1984 5643/2741	04\05\1982 5650/3140	11\08\1977 5331/2116
	. Reg.date	13\06\197	12\11\197 18\08\193	19\04\195	10\03\199	19/11/198	04\05\198	11\08\197
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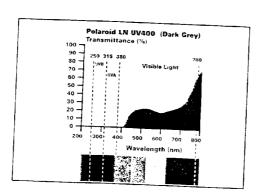
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Reg.date Journal	15/08/1977 5241/213	08\01\1991 5913/1692
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ANNEX B

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 of the Polaroid polarfun atmosphere.

The original Polaroid polarising lens





UV Performance

Average UV Transmittance to 380 nm	0%
Average UV Transmittance to 400 nm	<0.1%
Transmittance at 400 nm	<0.5%

One of the few lenses with a clearly visible consumer benefit—the dramatic reduction of horizontally reflected glare—the original Polaroid polarising lens also maintains its superiority over standard polarising lenses through upgraded UV performance and unique hard-coating and lensforming technology.











The Visible Difference — performance you can see!



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