In **T 849/11** the board summarised case law on the requirements of Art. 84 EPC with regard to the characterisation of an invention by parameters. The board stated that: i. the claims must be clear in themselves when read by the skilled person; and ii. the method for measuring a parameter (or at least a reference thereto) must appear completely in the claim itself (see **T 1156/01**, **T 412/02**, **T 908/04**, **T 555/05**, **T 1497/08**), and that iii. the applicant who chooses to define the scope of the claim by parameters should ensure that a skilled person can easily and unambiguously verify whether he is working inside or outside the scope of the claim. The board further stated that the requirements of Art. 84 EPC can still be met if it can be convincingly shown that: i. the method to be employed belongs to the skilled person's common general knowledge, or ii. all the methodologies known in the relevant technical field for determining this parameter yield the same result within the appropriate limit of measurement accuracy (see **T 1156/01**).

In **T 29/05** it was found that although different experimental protocols might be applied in the case in point for assessing hybridisation under stringent conditions, they were usual in the art (following **T 1084/00**).

In **T 307/06** the claims contained the added feature "and a T_g of less than 25°C". The board noted that there were different methods for determining T_g (glass transition temperature). However, the mere fact that several methods existed did not render the claims unclear if at least one of the following conditions was met: (a) the different methods yield essentially the same T_g values for the same material, or (b) the person skilled in the art had associated the range of T_g values mentioned in claim 1 at issue with only one standard method of measurement. Neither condition (a) nor (b) was fulfilled. The board concluded that this left doubt as to which subject-matter was covered by claim 1, and thus rendered said claim unclear (see **T 728/98**, OJ 2001, 319; **T 306/13**).

In **T 2676/16** the board disagreed with the examining division that the parameter "an outcome of a pseudo-random hopping" of the method of claim 1 was not clear because it could have many interpretations to a skilled person in the field of telecommunications. In context, the term "outcome" had the same meaning as "result". It was clear that by means of the "pseudo-random hopping" operation a scalar number was to be produced. The meaning of "pseudo-random" was also clear for the skilled reader. The fact that a feature could be implemented in various ways did not necessarily render this feature unclear.

In a number of decisions the boards stress that it must be clear to the skilled reader from the claim itself how the parameters are to be determined, unless it can be demonstrated that the skilled reader would immediately know which method and conditions to apply even without any such indication in the claim.

In **T 412/02** the board held that the unambiguous characterisation in a claim of a product by parameters or by a mathematical relation between parameters necessarily required that each parameter could be clearly and reliably determined. In the board's view, it followed that the knowledge of the method and conditions of determination of the parameter was necessary for the unambiguous definition of the parameters and, as a consequence, for the unambiguous definition of a mathematical relation between them. Thus, in order to allow the matter for which protection was sought to be defined, it had to