could be demonstrated, in a given case, that there was a direct causal connection with a technical effect relevant for solving a technical problem.

9.2.16 Logistics

In **T 696/06** the application concerned a data processing system intended to facilitate confronting an offer and a demand in the field of transporting travellers or goods. Essentially the system executed business processes and transactions, like mediating offers and demands, which were typical for a transportation broker or freight exchange service and which the board held not to be technical.

In **T 912/05** the application related to a mail delivery system that could deliver by physical and/or electronic means. The board held that methods of mail delivery can qualify as inventions if they involve "technical means", with mail delivery by e-mail qualifying as such.

9.3. Combination invention

9.3.1 Existence of a combination invention

In assessing the inventive step involved in an invention based on a combination of features, consideration must be given to whether or not the state of the art suggested to a skilled person precisely the combination of features claimed. The fact that an individual feature or a number of features were known individually does not conclusively show the obviousness of a combination (**T 37/85**, OJ 1988, 86; **T 656/93**; **T 666/93**; **T 1018/96**). The question is not whether the skilled person, with access to the entire prior art, **could** have made the combination according to the invention, but whether he actually **would** have done so in expectation of an improvement (**T 2/83**, OJ 1984, 265; **T 713/93**; **T 223/94**; **T 406/98**). When assessing inventive step in a combination invention, the decisive criterion is not whether individual elements of the combination were known and obvious from prior art, but whether the state of the art would lead a skilled person to this particular overall combination of (possibly already known) features. Were this not so, it would be impossible for a combination consisting exclusively of known individual features to involve an inventive step (**T 37/85**, OJ 1988, 86; **T 388/89**; **T 717/90**; **T 869/96**).

A mere aggregation of features must be distinguished from a combination invention.

The existence of a combination invention requires that the relationship between the features or groups of features be one of **functional reciprocity** or that they show a combinative effect beyond the sum of their individual effects. In **T 1054/05** the board stated that two features interacted **synergistically** if their functions were interrelated and lead to an additional effect that went beyond the sum of the effects of each feature taken in isolation. It was not enough that the features solved the same technical problem or that their effects were of the same kind and added up to an increased but otherwise unchanged effect (see also **T 926/11**, in which it was found there was no synergistic effect between the feature groups). See also in this chapter I.D.9.2.2.