

Agreement on Trade in Services (GATS), respectively. As a result, more disputes are actionable under the DSU. This is not to say that disputes in IP and traded services eluded the GATT, for in fact GATT handled a small, but highly contentious, set of cases touching on these areas, with little effect on the status quo.⁴¹ For its part, the WTO has adjudicated nine US-EC disputes in IP and traded services, as listed in Table 3.

Table 3. US-EC IP and Services Disputes under the WTO

DS	Start	Compl. / Def.	Title	End	Level of Concessions
37	30-Apr-1996	US vs. PT	Patent Protection Under the Industrial Property Act	1996	Full
80	2-May-1997	US vs. BE	Measures Affecting Commercial Telephone Directory Services	1998	Full
83	14-May-1997	US vs. DK	Measures Affecting the Enforcement of IP Rights	2001	Full
86	28-May-1997	US vs. SE	Measures Affecting the Enforcement of IP Rights	1998	Full
82, 115	14-May-1997	US vs. EC, IE	Measures Affecting the Grant of Copyright and of Neighbouring Rights	1998	Full
124, 125	30-Apr-1998	US vs. EC, GR	Enforcement of IP Rights For Motion Pictures and Television Programs	2001	Full
160	26-Jan-1999	EC vs. US	Section 110(5) of the US Copyright Act ("Irish Music")	2002*	Partial*
174	1-Jun-1999	US vs. EC	Protection of Trademarks and Geographical Indications for Ag. Products	2002*	Partial*
176	8-Jul-1999	EC vs. US	Section 211 Omnibus Appropriations Act ("Havana Club")	2002*	Full*

* denotes cases with apparent but still tentative policy outcomes.

⁴¹ Neither did the US or EC budge as defendants in IP/services complaints brought by third parties under the GATT, e.g., *Austria v. Germany Truck Traffic Restrictions* (1990) and *Canada v. US Spring Assemblies* (1981).