EXHIBIT C-2 to Defendants' Invalidity Contentions
Daingean Techs. v. AT&T Corp. et al., Case No. 2:23-cv-00123-JRG-RSP (E.D. Tex.)

Invalidity of U.S. Patent No. 10,841,958 ("the 958 patent") over U.S. Patent Publication No. 2019/0158988 ("Lee 988")

U.S. Patent Publication No. 2019/0158988 ("Lee 988") anticipates under at least 35 U.S.C. § 102(a)(2), and/or renders obvious under 35 U.S.C. § 103, alone or in combination with other references and the knowledge of a person of ordinary skill in the art, claims 1, 2, 3, and 4 of U.S. Patent No. 10,841,958 ("the '958 Patent").

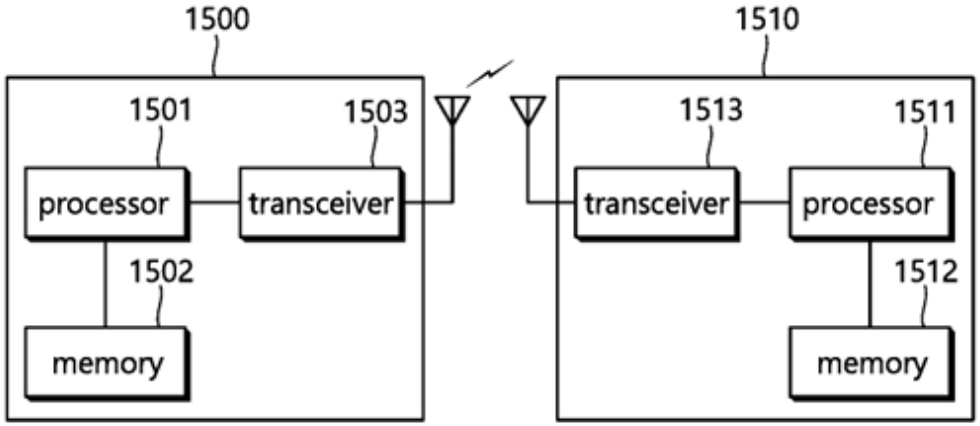
Claim	Grounds for Invalidity
1. [Pre] An access node of a radio access network that communicates over a radio interface with a wireless terminal, the access node comprising:	Lee 988 teaches an access node of a radio access network that communicates over a radio interface with a wireless terminal. Illustrative citations showing disclosures of this element are reproduced below. Provided are a method for a terminal for requesting a system information block (SIB), and an apparatus for supporting the method in a wireless communication system. The method may comprise the steps of: receiving, from a radio access network (RAN), an SIB list comprising one or more SIBs supported by a cell; receiving, from the RAN, SIB broadcast information indicating whether the SIB supported by the cell is broadcast in a broadcast control channel (BCCH) section; detecting an omitted SIB on the basis of the SIB list and SIB broadcast information; and requesting the omitted SIB from the RAN. Lee 988 at Abstract.

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Claim	Grounds for Invalidity
	[0009] According to an embodiment, there is provided a method for requesting, by a user equipment (UE), a system information block (SIB) in a wireless communication system. The method may include: receiving an SIB list including one or more SIBs supported by a cell from a radio access network (RAN); receiving, from the RAN, SIB broadcast information indicating whether an SIB supported by the cell is broadcast in a broadcast control channel (BCCH) period; detecting a missing SIB based on the SIB list and the SIB broadcast information; and requesting the missing SIB from the RAN. Lee 988 at [0009]. **[0041]** Referring to FIG. **1**, the LTE system architecture includes one or more user equipment (UE; **10**), an evolved-UMTS terrestrial radio access network (E-UTRAN) and an evolved packet core (EPC). The UE **10** refers to a communication equipment carried by a user. The UE **10** may be fixed or mobile, and may be referred to as another terminology, such as a mobile station (MS), a user terminal (UT), a subscriber station (SS), a wireless device, etc. Lee 988 at [0041]. In addition, to the extent it is found that Lee 988 does not expressly disclose this limitation, the limitation is inherent. Moreover, to the extent it is found that Lee 988 does not anticipate this claim, Lee 988 renders it obvious, either alone, in combination with the knowledge of a person of ordinary skill in the art, and/or in combination with other prior art references identified in the cover pleading or herein. A person of ordinary skill in the art would have been motivated to combine Lee 988 with any of the other prior art references identified in the cover pleading or herein with a reasonable expectation of success because each of these references contains familiar elements within the same field of endeavor to address the same known problems, according to known methods which would yield predictable results.

Claim	Grounds for Invalidity
[1.1] processor circuitry configured:	Lee 988 teaches processor circuitry. Illustrative citations showing disclosures of this element are reproduced below. **[0020]** According to another embodiment, there is provided a UE for requesting an SIB in a wireless communication system. The UE may include: a memory; a transceiver; and a processor to connect the memory and the transceiver, wherein the processor may be configured to: control the transceiver to receive an SIB list including one or more SIBs supported by a cell from an RAN; control the transceiver to receive, from the RAN, SIB broadcast information indicating whether an SIB supported by the cell is broadcast in a broadcast control channel (BCCH) period; detect a missing SIB based on the SIB list and the SIB broadcast information; and control the transceiver to request the missing SIB from the RAN. Lee 988 at [0020]. **[0184]** A BS **1500** includes a processor **1501**, a memory **1502** and a transceiver **1503**. The memory **1502** is connected to the processor **1501**, and stores various types of information for driving the processor **1501**. The transceiver **1503** is connected to the processor **1501**, and transmits and/or receives radio signals. The processor **1501** implements proposed functions, processes and/or methods. In the above embodiment, an operation of the BS may be implemented by the processor **1501**. Lee 988 at [0184].

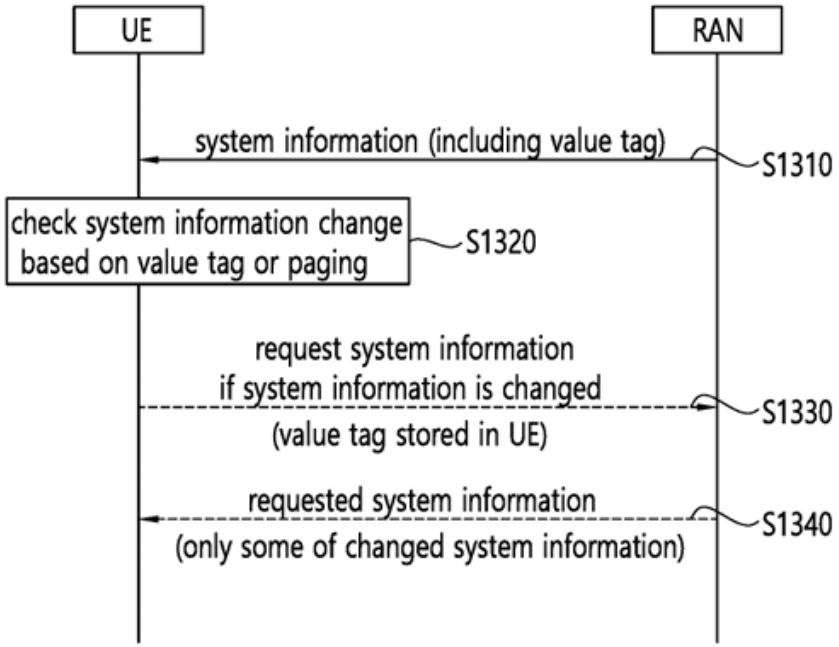
Claim	Grounds for Invalidity
	[0185] A UE **1510** includes a processor **1511**, a memory **1512** and a transceiver **1513**. The memory **1512** is connected to the processor **1511**, and stores various types of information for driving the processor **1511**. The transceiver **1513** is connected to the processor **1511**, and transmits and/or receives radio signals. The processor **1511** implements proposed functions, processes and/or methods. In the above embodiment, an operation of the UE may be implemented by the processor **1511**. Lee 988 at [0185]. **[0186]** The processor may include an application-specific integrated circuit (ASIC), a separate chipset, a logic circuit, and/or a data processing unit. The memory may include a read-only memory (ROM), a random access memory (RAM), a flash memory, a memory card, a storage medium, and/or other equivalent storage devices. The transceiver may include a base-band circuit for processing a wireless signal. When the embodiment is implemented in software, the aforementioned methods can be implemented with a module (i.e., process, function, etc.) for performing the aforementioned functions. The module may be stored in the memory and may be performed by the processor. The memory may be located inside or outside the processor, and may be coupled to the processor by using various well-known means. Lee 988 at [0186].

Claim	Grounds for Invalidity
	 Lee 988 at Figure 15, *see also* Lee 988 at [0037] ("FIG. 15 is a block diagram illustrating a wireless communication system according to the embodiment of the present invention. ") In addition, to the extent it is found that Lee 988 does not expressly disclose this limitation, the limitation is inherent. Moreover, to the extent it is found that Lee 988 does not anticipate this claim, Lee 988 renders it obvious, either alone, in combination with the knowledge of a person of ordinary skill in the art, and/or in combination with other prior art references identified in the cover pleading or herein. A person of ordinary skill in the art would have been motivated to combine Lee 988 with any of the other prior art references identified in the cover pleading or herein with a reasonable expectation of success because each of these references contains familiar elements within the same field of endeavor to address the same known problems, according to known methods which would yield predictable results.
[1.2] to generate a first type system information block	Lee 988 teaches generating a first type system information block (SIB) comprising information and a value tag, the information indicating whether one or more associated second type system

Claim	Grounds for Invalidity
(SIB) comprising information and a value tag, the information indicating whether one or more associated second type system information blocks are provided by broadcast or on-demand, the value tag being updated upon a change of a corresponding second type SIB, the first type SIB being required for the wireless terminal to perform an initial access to the radio access network;	information blocks are provided by broadcast or on-demand, the value tag being updated upon a change of a corresponding second type SIB, the first type SIB being required for the wireless terminal to perform an initial access to the radio access network. Illustrative citations showing disclosures of this element are reproduced below. **[0020]** According to another embodiment, there is provided a UE for requesting an SIB in a wireless communication system. The UE may include: a memory; a transceiver; and a processor to connect the memory and the transceiver, wherein the processor may be configured to: control the transceiver to receive an SIB list including one or more SIBs supported by a cell from an RAN; control the transceiver to receive, from the RAN, SIB broadcast information indicating whether an SIB supported by the cell is broadcast in a broadcast control channel (BCCH) period; detect a missing SIB based on the SIB list and the SIB broadcast information; and control the transceiver to request the missing SIB from the RAN. Lee 988 at [0020].

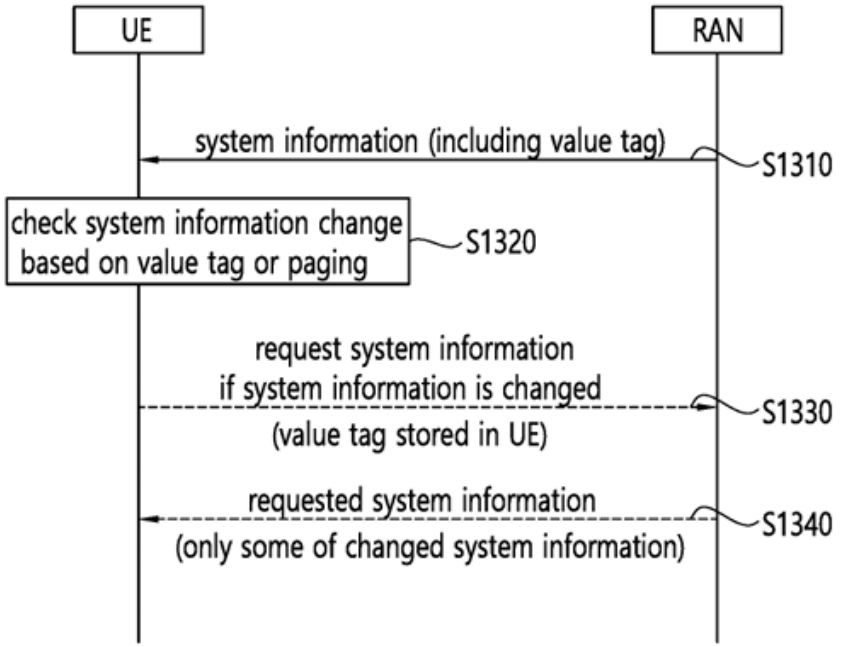
Claim	Grounds for Invalidity
	[0071] SIB**1** includes pieces of information associated with cell access, and particularly includes scheduling information on other SIB s (SIB**2** to SIBn) than SIB**1**. SIBs having the same transmission periodicity among the SIBs other than SIB**1** are transferred via the same system information (SI) message. Thus, scheduling information includes a mapping relationship between each SIB and an SI message. An SI message is transmitted within an SI window in a time domain, and each SI message is associated with one SI window. Since SI windows for different pieces of SI do not overlap, only one SI message is transmitted within an SI window. Thus, scheduling information includes the duration of an SI window and an SI transmission periodicity. Time/frequency for transmitting an SI message is determined by dynamic scheduling by a BS. SIB**1** is broadcast through a downlink shared channel (DL SCH) according to a periodicity of eight radio frames (that is, 80-ms periodicity), and SIB**1** is repeatedly retransmitted on a fifth subframe of an SFN-mod-2 radio frame within the 80-ms periodicity. Lee 988 at [0071]. **[0133]** (3) Value Tag **[0134]** The SI polling information may include a value tag indicating system information to be transmitted when the UE requests system information. **[0135]** For example, when the UE has already stored the system information corresponding to the value tag for the cell, the UE does not request system information. When the UE stores system information not corresponding to the value tag for the cell, the UE may request system information. Alternatively, when the UE does not store system information for the cell, the UE may request system information. Lee 988 at [0133]-[0135].

Claim	Grounds for Invalidity
	[0167] When a network changes a particular type of on-demand system information, the network may broadcast the changed system information or all system information during a specified period. For example, the specified period may be a modification period. The specified period may be set in master system information or any necessary system information. Lee 988 at [0167]. **[0168]** Referring to FIG. **13**, in step **S1310**, the network may indicate to the UE that on-demand system information is to be changed by broadcast signaling during a specified period. For example, the broadcast signaling may be essential system information or a paging message. This indication may include a value tag for a particular type of system information or a common value tag for all system information. Additionally, the network may indicate to the UE whether on-demand system information is broadcast in the next period (e.g., the next modification period). When the network intends to broadcast on-demand system information in the next period, the network may indicate to the UE whether all system information is broadcast or only changed on-demand system information is broadcast. Regardless of on-demand system information, the network may broadcast all system information or changed on-demand system information without a request by the UE. Lee 988 at [0168].

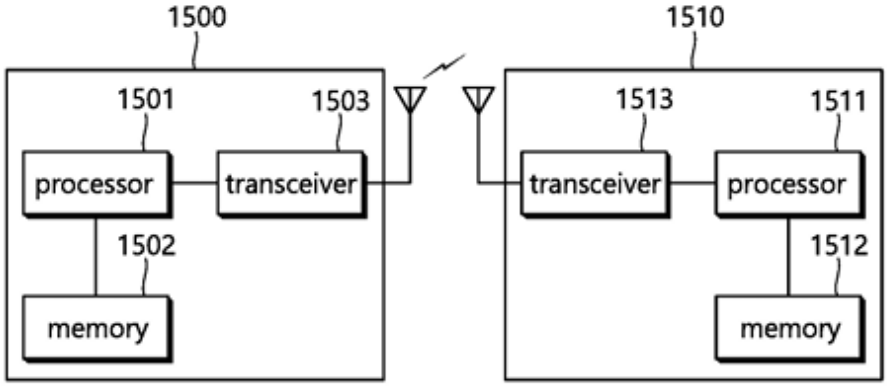
Claim	Grounds for Invalidity
	 Lee 988 at Figure 13. *See also* [0166] ("FIG. 13 illustrates a procedure in which a UE requests changed system information when system information is changed according to an embodiment of the present invention.") In addition, to the extent it is found that Lee 988 does not expressly disclose this limitation, the limitation is inherent. Moreover, to the extent it is found that Lee 988 does not anticipate this claim, Lee 988 renders it obvious, either alone, in combination with the knowledge of a person of ordinary skill in the art, and/or in combination with other prior art references identified in the cover pleading or herein. A person of ordinary skill in the art would have been motivated to combine Lee 988 with any of the other prior art references identified in the cover pleading or herein with a reasonable

Claim	Grounds for Invalidity
	expectation of success because each of these references contains familiar elements within the same field of endeavor to address the same known problems, according to known methods which would yield predictable results.
[1.3] upon a change of a second type SIB whose associated information indicated before the change that the second type SIB was provided on-demand, to include in the first type SIB the information associated with the second type SIB indicating that the second type SIB is provided by broadcast;	Lee 988 teaches upon a change of a second type SIB whose associated information indicated before the change that the second type SIB was provided on-demand, to include in the first type SIB the information associated with the second type SIB indicating that the second type SIB is provided by broadcast. Illustrative citations showing disclosures of this element are reproduced below. **[0167]** When a network changes a particular type of on-demand system information, the network may broadcast the changed system information or all system information during a specified period. For example, the specified period may be a modification period. The specified period may be set in master system information or any necessary system information. Lee 988 at [0167]. **[0168]** Referring to FIG. **13**, in step **S1310**, the network may indicate to the UE that on-demand system information is to be changed by broadcast signaling during a specified period. For example, the broadcast signaling may be essential system information or a paging message. This indication may include a value tag for a particular type of system information or a common value tag for all system information. Additionally, the network may indicate to the UE whether on-demand system information is broadcast in the next period (e.g., the next modification period). When the network intends to broadcast on-demand system information in the next period, the network may indicate to the UE whether all system information is broadcast or only changed on-demand system information is broadcast. Regardless of on-demand system information, the network may broadcast all system information or changed on-demand system information without a request by the UE.

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	Lee 988 at [0168]. In addition, to the extent it is found that Lee 988 does not expressly disclose this limitation, the limitation is inherent. Moreover, to the extent it is found that Lee 988 does not anticipate this claim, Lee 988 renders it obvious, either alone, in combination with the knowledge of a person of ordinary skill in the art, and/or in combination with other prior art references identified in the cover pleading or herein. A person of ordinary skill in the art would have been motivated to combine Lee 988 with any of the other prior art references identified in the cover pleading or herein with a reasonable expectation of success because each of these references contains familiar elements within the same field of endeavor to address the same known problems, according to known methods which would yield predictable results.

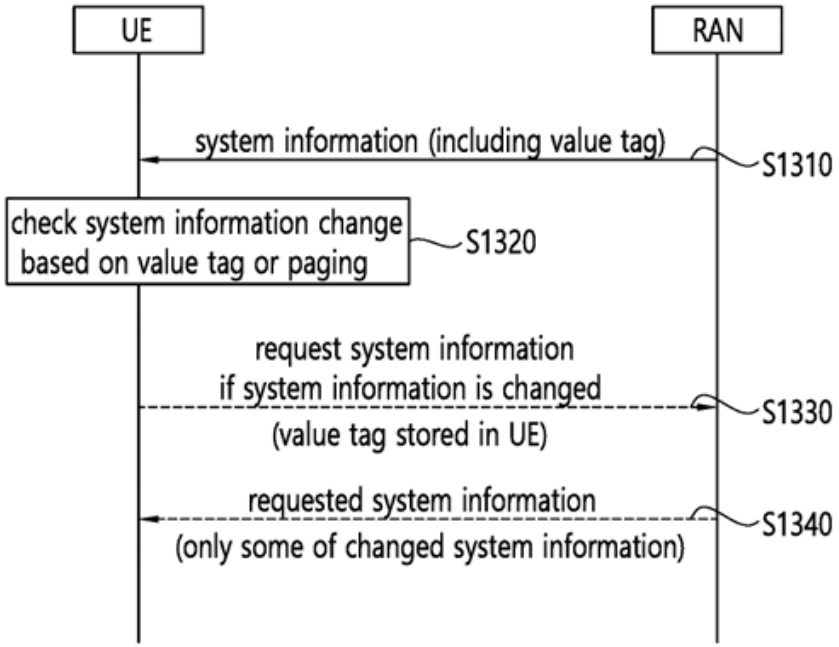
Claim	Grounds for Invalidity
	 Lee 988 at Figure 13. In addition, to the extent it is found that Lee 988 does not expressly disclose this limitation, the limitation is inherent. Moreover, to the extent it is found that Lee 988 does not anticipate this claim, Lee 988 renders it obvious, either alone, in combination with the knowledge of a person of ordinary skill in the art, and/or in combination with other prior art references identified in the cover pleading or herein. A person of ordinary skill in the art would have been motivated to combine Lee 988 with any of the other prior art references identified in the cover pleading or herein with a reasonable expectation of success because each of these references contains familiar elements within the same

Claim	Grounds for Invalidity
	field of endeavor to address the same known problems, according to known methods which would yield predictable results.
[1.4] transmitter circuitry configured to:	Lee 988 teaches transmitter circuitry. Illustrative citations showing disclosures of this element are reproduced below. **[0071]** SIB**1** includes pieces of information associated with cell access, and particularly includes scheduling information on other SIB s (SIB**2** to SIBn) than SIB**1**. SIBs having the same transmission periodicity among the SIBs other than SIB**1** are transferred via the same system information (SI) message. Thus, scheduling information includes a mapping relationship between each SIB and an SI message. An SI message is transmitted within an SI window in a time domain, and each SI message is associated with one SI window. Since SI windows for different pieces of SI do not overlap, only one SI message is transmitted within an SI window. Thus, scheduling information includes the duration of an SI window and an SI transmission periodicity. Time/frequency for transmitting an SI message is determined by dynamic scheduling by a BS. SIB**1** is broadcast through a downlink shared channel (DL SCH) according to a periodicity of eight radio frames (that is, 80-ms periodicity), and SIB**1** is repeatedly retransmitted on a fifth subframe of an SFN-mod-2 radio frame within the 80-ms periodicity. Lee 988 at [0071].

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	[0076] System information is commonly applied to all UEs accessing a cell, and UEs need to always maintain up-to-date system information to perform an appropriate operation. When system information is changed, UEs need to know in advance the time the BS transmits new system information. In order that a BS and a UE mutually recognize a radio frame period for transmitting new system information, the concept of BCCH modification period is introduced in "3GPP TS 36.331 v9. 3.0," which is described in detail. Lee 988 at [0076].  Lee 988 at Figure 15.

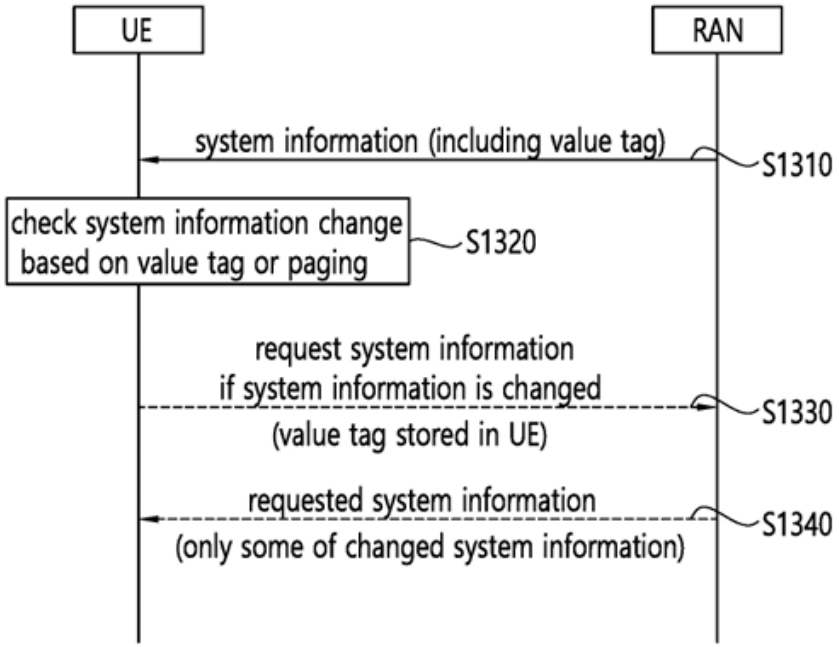
Claim	Grounds for Invalidity
	[0183] FIG. **15** is a block diagram illustrating a wireless communication system according to the embodiment of the present invention. **[0184]** A BS **1500** includes a processor **1501**, a memory **1502** and a transceiver **1503**. The memory **1502** is connected to the processor **1501**, and stores various types of information for driving the processor **1501**. The transceiver **1503** is connected to the processor **1501**, and transmits and/or receives radio signals. The processor **1501** implements proposed functions, processes and/or methods. In the above embodiment, an operation of the BS may be implemented by the processor **1501**. **[0185]** A UE **1510** includes a processor **1511**, a memory **1512** and a transceiver **1513**. The memory **1512** is connected to the processor **1511**, and stores various types of information for driving the processor **1511**. The transceiver **1513** is connected to the processor **1511**, and transmits and/or receives radio signals. The processor **1511** implements proposed functions, processes and/or methods. In the above embodiment, an operation of the UE may be implemented by the processor **1511**. Lee 988 at [0183]-[0185].
[1.5] transmit the first type SIB;	Lee 988 teaches transmitting the first type SIB. Illustrative citations showing disclosures of this element are reproduced below.

Claim	Grounds for Invalidity
	[0071] SIB**1** includes pieces of information associated with cell access, and particularly includes scheduling information on other SIB s (SIB**2** to SIBn) than SIB**1**. SIBs having the same transmission periodicity among the SIBs other than SIB**1** are transferred via the same system information (SI) message. Thus, scheduling information includes a mapping relationship between each SIB and an SI message. An SI message is transmitted within an SI window in a time domain, and each SI message is associated with one SI window. Since SI windows for different pieces of SI do not overlap, only one SI message is transmitted within an SI window. Thus, scheduling information includes the duration of an SI window and an SI transmission periodicity. Time/frequency for transmitting an SI message is determined by dynamic scheduling by a BS. SIB**1** is broadcast through a downlink shared channel (DL SCH) according to a periodicity of eight radio frames (that is, 80-ms periodicity), and SIB**1** is repeatedly retransmitted on a fifth subframe of an SFN-mod-2 radio frame within the 80-ms periodicity. Lee 988 at [0071].

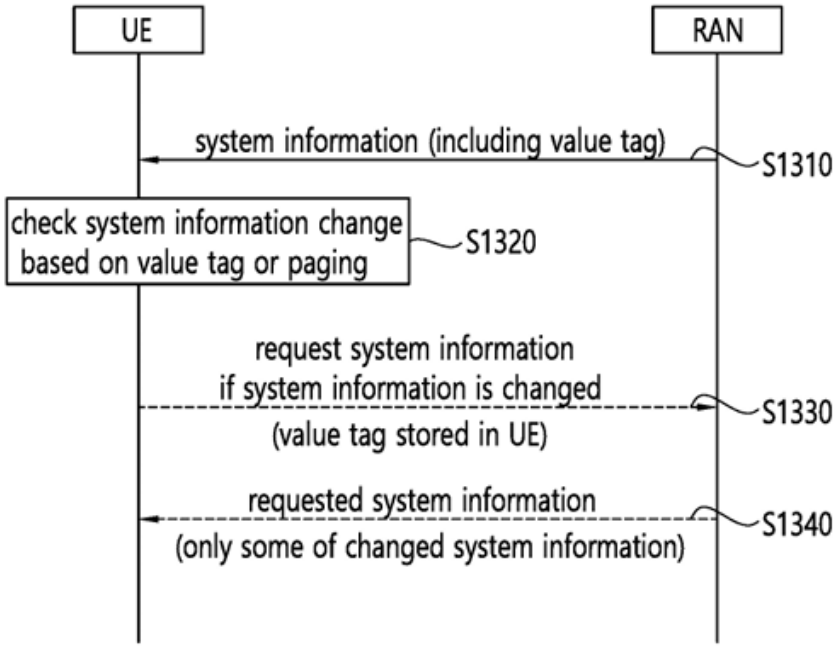
Claim	Grounds for Invalidity
	 Lee 988 at Figure 13. *See also* [0166] ("FIG. 13 illustrates a procedure in which a UE requests changed system information when system information is changed according to an embodiment of the present invention.") In addition, to the extent it is found that Lee 988 does not expressly disclose this limitation, the limitation is inherent. Moreover, to the extent it is found that Lee 988 does not anticipate this claim, Lee 988 renders it obvious, either alone, in combination with the knowledge of a person of ordinary skill in the art, and/or in combination with other prior art references identified in the cover pleading or herein. A person of ordinary skill in the art would have been motivated to combine Lee 988 with any of the other prior art references identified in the cover pleading or herein with a reasonable

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	expectation of success because each of these references contains familiar elements within the same field of endeavor to address the same known problems, according to known methods which would yield predictable results.
[1.6] transmit a message that triggers the wireless terminal to receive the first type SIB, wherein;	Lee 988 teaches transmitting a message that triggers the wireless terminal to receive the first type SIB. Illustrative citations showing disclosures of this element are reproduced below. **[0071]** SIB**1** includes pieces of information associated with cell access, and particularly includes scheduling information on other SIB s (SIB**2** to SIBn) than SIB**1**. SIBs having the same transmission periodicity among the SIBs other than SIB**1** are transferred via the same system information (SI) message. Thus, scheduling information includes a mapping relationship between each SIB and an SI message. An SI message is transmitted within an SI window in a time domain, and each SI message is associated with one SI window. Since SI windows for different pieces of SI do not overlap, only one SI message is transmitted within an SI window. Thus, scheduling information includes the duration of an SI window and an SI transmission periodicity. Time/frequency for transmitting an SI message is determined by dynamic scheduling by a BS. SIB**1** is broadcast through a downlink shared channel (DL SCH) according to a periodicity of eight radio frames (that is, 80-ms periodicity), and SIB**1** is repeatedly retransmitted on a fifth subframe of an SFN-mod-2 radio frame within the 80-ms periodicity. Lee 988 at [0071].

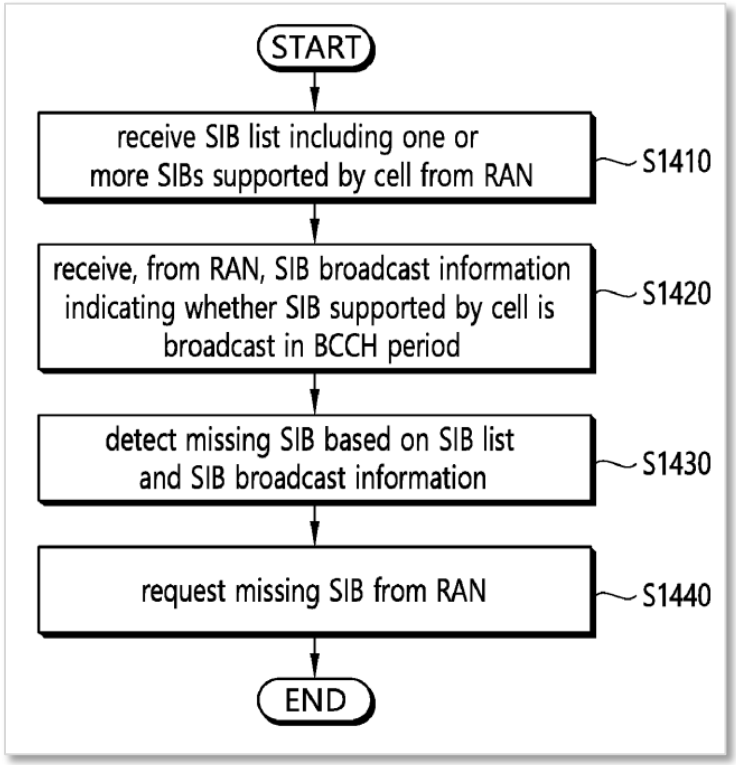
Claim	Grounds for Invalidity
	[0168] Referring to FIG. **13**, in step **S1310**, the network may indicate to the UE that on-demand system information is to be changed by broadcast signaling during a specified period. For example, the broadcast signaling may be essential system information or a paging message. This indication may include a value tag for a particular type of system information or a common value tag for all system information. Additionally, the network may indicate to the UE whether on-demand system information is broadcast in the next period (e.g., the next modification period). When the network intends to broadcast on-demand system information in the next period, the network may indicate to the UE whether all system information is broadcast or only changed on-demand system information is broadcast. Regardless of on-demand system information, the network may broadcast all system information or changed on-demand system information without a request by the UE. Lee 988 at [0168].

Claim	Grounds for Invalidity
	 Lee 988 at Figure 13. *See also* [0166] ("FIG. 13 illustrates a procedure in which a UE requests changed system information when system information is changed according to an embodiment of the present invention.") In addition, to the extent it is found that Lee 988 does not expressly disclose this limitation, the limitation is inherent. Moreover, to the extent it is found that Lee 988 does not anticipate this claim, Lee 988 renders it obvious, either alone, in combination with the knowledge of a person of ordinary skill in the art, and/or in combination with other prior art references identified in the cover pleading or herein. A person of ordinary skill in the art would have been motivated to combine Lee 988 with any of the other prior art references identified in the cover pleading or herein with a reasonable

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	expectation of success because each of these references contains familiar elements within the same field of endeavor to address the same known problems, according to known methods which would yield predictable results.
[1.7] whether or not the second type SIB has changed is determined based on a value tag, associated with the second type SIB, stored in the wireless terminal, and the value tag included in the first type SIB corresponding to the second type SIB.	Lee 988 teaches that whether or not the second type SIB has changed is determined based on a value tag, associated with the second type SIB, stored in the wireless terminal, and the value tag included in the first type SIB corresponding to the second type SIB. Illustrative citations showing disclosures of this element are reproduced below. **[0169]** In step **S1320**, the UE may check whether the on-demand system information is changed. For example, the UE may determine whether the on-demand system information is changed based on the value tag. For example, the UE may determine whether the on-demand system information is changed based on the paging message. Lee 988 at [0169]. **[0170]** In step **S1330**, when the UE recognizes that the on-demand system information is changed and the on-demand system information is not scheduled to be broadcast, the UE may trigger a system information request for the on-demand system information. On the other hand, when the UE recognizes that the on-demand system information is changed and the on-demand system information is scheduled to be broadcast, the UE may not trigger a system information request for the on-demand system information.

Claim	Grounds for Invalidity
	When the network broadcasts only the changed on-demand system information but the UE requires a particular type of system information that is different from the changed on-demand system information, the UE may trigger a system information request for the particular type of system information. Additionally, when the UE triggers a system information request, the value tag stored in the UE may be transmitted to an RAN. Lee 988 at [0170]. 

Claim	Grounds for Invalidity
	Lee 988 at Figure 13. *See also* [0166] ("FIG. 13 illustrates a procedure in which a UE requests changed system information when system information is changed according to an embodiment of the present invention.") In addition, to the extent it is found that Lee 988 does not expressly disclose this limitation, the limitation is inherent. Moreover, to the extent it is found that Lee 988 does not anticipate this claim, Lee 988 renders it obvious, either alone, in combination with the knowledge of a person of ordinary skill in the art, and/or in combination with other prior art references identified in the cover pleading or herein. A person of ordinary skill in the art would have been motivated to combine Lee 988 with any of the other prior art references identified in the cover pleading or herein with a reasonable expectation of success because each of these references contains familiar elements within the same field of endeavor to address the same known problems, according to known methods which would yield predictable results.
2. The access node of claim 1, wherein the transmitter circuitry is further configured to transmit the second type SIB by broadcast after the change.	Lee 988 teaches transmitter circuitry further configured to transmit the second type SIB by broadcast after the change. Illustrative citations showing disclosures of this element are reproduced below.

Claim	Grounds for Invalidity
	 Lee 988 at Figure 14. **[0121]** To save energy, to reduce overheads, and to save resources, different cells may broadcast different sets of SIBs. For example, a first cell may broadcast SIB**1** and SIB**2**, while a second cell different from the first cell may broadcast SIB**1**, SIB**2**, and SIB**3**. Lee 988 at [0121].

Claim	Grounds for Invalidity
	[0167] When a network changes a particular type of on-demand system information, the network may broadcast the changed system information or all system information during a specified period. For example, the specified period may be a modification period. The specified period may be set in master system information or any necessary system information. Lee 988 at [0167]. **[0168]** Referring to FIG. **13**, in step **S1310**, the network may indicate to the UE that on-demand system information is to be changed by broadcast signaling during a specified period. For example, the broadcast signaling may be essential system information or a paging message. This indication may include a value tag for a particular type of system information or a common value tag for all system information. Additionally, the network may indicate to the UE whether on-demand system information is broadcast in the next period (e.g., the next modification period). When the network intends to broadcast on-demand system information in the next period, the network may indicate to the UE whether all system information is broadcast or only changed on-demand system information is broadcast. Regardless of on-demand system information, the network may broadcast all system information or changed on-demand system information without a request by the UE. Lee 988 at [0168]. In addition, to the extent it is found that Lee 988 does not expressly disclose this limitation, the limitation is inherent. Moreover, to the extent it is found that Lee 988 does not anticipate this claim, Lee 988 renders it obvious, either alone, in combination with the knowledge of a person of ordinary

Claim	Grounds for Invalidity
	skill in the art, and/or in combination with other prior art references identified in the cover pleading or herein. A person of ordinary skill in the art would have been motivated to combine Lee 988 with any of the other prior art references identified in the cover pleading or herein with a reasonable expectation of success because each of these references contains familiar elements within the same field of endeavor to address the same known problems, according to known methods which would yield predictable results.
3. [Pre] A method for an access node of a radio access network that communicates over a radio interface with a wireless terminal, the method comprising:	Lee 988 teaches a method for an access node of a radio access network that communicates over a radio interface with a wireless terminal. The discussion of claim element 1[pre] is incorporated herein by reference.
[3.1] generating a first type system information block (SIB) comprising information and a value tag, the information indicating whether one or more associated second type system information blocks are provided by broadcast or on-demand, the value tag being updated upon a change of a corresponding second type SIB, the first type SIB being required for the wireless terminal to perform an initial access to the radio access network;	Lee 988 teaches generating a first type system information block (SIB) comprising information and a value tag, the information indicating whether one or more associated second type system information blocks are provided by broadcast or on-demand, the value tag being updated upon a change of a corresponding second type SIB, the first type SIB being required for the wireless terminal to perform an initial access to the radio access network. The discussion of claim element [1.2] is incorporated herein by reference.

Claim	Grounds for Invalidity
[3.2] upon a change of a second type SIB whose associated information indicated before the change that the second type SIB was provided on-demand, including in the first type SIB the information associated with the second type SIB indicating that the second type SIB is provided by broadcast;	Lee 988 teaches upon a change of a second type SIB whose associated information indicated before the change that the second type SIB was provided on-demand, including in the first type SIB the information associated with the second type SIB indicating that the second type SIB is provided by broadcast. The discussion of claim element [1.3] is incorporated herein by reference.
[3.3] transmitting the first type SIB;	Lee 988 teaches transmitting the first type SIB. The discussion of claim element [1.5] is incorporated herein by reference.
[3.4] transmitting a message that triggers the wireless terminal to receive the first type SIB,	Lee 988 teaches transmitting a message that triggers the wireless terminal to receive the first type SIB. The discussion of claim element [1.6] is incorporated herein by reference.
[3.5] wherein; whether or not the second type SIB has changed is determined based on a value tag, associated with the second type SIB, stored in the wireless terminal, and the value tag included in the first type SIB corresponding to the second type SIB.	Lee 988 teaches that whether or not the second type SIB has changed is determined based on a value tag, associated with the second type SIB, stored in the wireless terminal, and the value tag included in the first type SIB corresponding to the second type SIB. The discussion of claim element [1.7] is incorporated herein by reference.
4. The method of claim 3, further comprising	Lee 988 teaches transmitting the second type SIB by broadcast after the change.

Claim	Grounds for Invalidity
transmitting the second type SIB by broadcast after the change.	The discussion of claim element [2] is incorporated herein by reference.