

Via Electronic Submission (<https://www.research.net/r/RegisterOfCopyrights>)

January 31, 2017

Dr. Carla Hayden
Librarian of Congress
The Library of Congress
101 Independence Ave SE
Washington, DC 20540

Re: Librarian of Congress Seeks Input on Register of Copyrights

Dear Dr. Hayden:

I write in response to your solicitation of stakeholder input on December 16, 2016 concerning the next Register of Copyrights.¹ As an association representing technology and Internet companies who benefit from and are regulated by the operation of the Copyright Act, the Computer & Communications Industry Association (CCIA)² considers the choice of the next Register to be crucial to our industry. In regard to your inquiry, CCIA submits the following comments on the Register of Copyrights.

Knowledge, Skills, and Abilities Most Important for the Register of Copyrights

The Register of Copyrights must have the expertise and resources to manage a modern, connected Copyright Office, with an increased focus on its core missions of registration and recordation. The next Register must be able to guide the Office in making registration and recordation data publicly available and interoperable, such as providing access to commercial users via some form of API to facilitate lowering the transaction costs of licensing. In particular, the Register must have the necessary experience to modernize the Office's information technology. In addition to being steeped in all of the complexities of copyright law, including the importance of balance, it is crucial that he or she have experience managing information technology, since the Register's role is to oversee the technical specialists engaged in registration and recordation. The ideal candidate would have a proven record of improving the efficiency of systems which process large volumes of information. All of these requirements point toward a candidate with skills managing complex projects, overseeing elaborate workflows, and a robust understanding of managing technology in the workforce.

Proposed Priorities for the Incoming Register

CCIA proposes the incoming Register prioritize the following:

- (1) Modernize the Office's technology infrastructure so as to enable the deployment of a public, searchable database of rightsholders and rights information;

¹ Available at <https://www.loc.gov/item/prn-16-215>.

² CCIA represents large, medium and small companies in the high technology products and services sectors, including computer hardware and software, electronic commerce, telecommunications and Internet products and services. Our members employ more than 750,000 workers and generate annual revenues in excess of \$540 billion. A list of CCIA members is available at <https://www.cciainet.org/members>.

- (2) Prioritize serving the needs of registrants and prospective licensees; and
- (3) Formalize outreach to all stakeholders of the copyright system.

Other Factors to Consider

The Copyright Office has confronted well-documented technology and infrastructure challenges which have hampered its ability to deliver on its primary mission of registering and recording copyrights in a manner which is useful for an era of digital commerce. The incoming Register should focus on meeting the needs of the individuals and businesses who benefit from and are regulated by the Copyright Act, within the current structure of the Library of Congress. While the new Register may benefit from greater autonomy with respect to budgetary and information technology choices, this flexibility can be achieved within the existing organizational structure of the Library.

Thank you for considering these comments. CCIA remains ready to assist the Librarian and the Office in their efforts.

Sincerely,

A handwritten signature in black ink, appearing to read "Ed Black". The signature is fluid and cursive, with a large, sweeping flourish at the end.

Ed Black
President & CEO
Computer & Communications Industry Association
655 15th Street NW, Suite 410
Washington, DC 20005