



1 February 2017

The Honorable Bob Goodlatte
Chairman
House Committee on the Judiciary
2309 Rayburn HOB
Washington, D.C. 20515

Via email: copyright.comments@mail.house.gov

Dear Chairman Goodlatte:

I am writing on behalf of Intellectual Property Owners Association (IPO) in support of the proposal for Reform of the Copyright Office (“Reform Proposal”) and to urge you to implement the Reform Proposal as soon possible. The sooner that the Reform Proposal is implemented, the sooner a more effective and efficient Copyright Office can be established that will benefit the copyright community and the public.

IPO is an international trade association representing companies and individuals in all industries and fields of technology who own, or are interested in, intellectual property rights. IPO’s membership includes about 200 companies and more than 12,000 individuals who are involved in the association either through their companies or as inventor, author, law firm, or attorney members. IPO membership spans 50 countries. IPO advocates for effective and affordable IP ownership rights and offers a wide array of services, including supporting member interests relating to legislative and international issues; analyzing current intellectual property issues; providing information and educational services; and disseminating information to the general public on the importance of intellectual property rights.

IPO generally supports the changes to the Copyright Office set out in the Reform Proposal. Allowing the Copyright Office autonomy over its budget allows it to nimbly adjust priorities as the market place adapts. This change will greatly assist the Copyright Office in today’s fast-paced and ever-changing technological landscape. As we stated in our letter to the Appropriations Committee dated 3 May 2016 (attached), IPO fully supports updating and modernizing the IT systems at the Copyright Office. Additionally, IPO believes that the establishment of both permanent and ad hoc advisory committees will provide the Copyright Office with much needed expert support.

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General Counsel
Michael D. Nolan
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Executive Director
Mark W. Lauroesch

INTELLECTUAL PROPERTY OWNERS ASSOCIATION

We appreciate the Committee's exhaustive efforts in reviewing the Copyright Act and the Copyright Office practices, structure and procedures. Please let us know if IPO can be helpful as you decide how to proceed.

Sincerely,

A handwritten signature in black ink, appearing to read "Mark W. Lauroesch". The signature is fluid and cursive, with a long horizontal stroke at the end.

Mark W. Lauroesch
Executive Director



May 3, 2016

The Honorable Shelley Moore Capito
Chairman
Subcommittee on Legislative Branch
Senate Committee on Appropriations
172 Russell Senate Office Building
Washington, DC 20510

The Honorable Tom Graves
Chairman
Subcommittee on Legislative Branch
House Committee on Appropriations
2442 Rayburn House Office Building
Washington, DC 20515

The Honorable Brian Schatz
Ranking Member
Subcommittee on Legislative Branch
Senate Committee on Appropriations
722 Hart Senate Office Building
Washington, DC 20510

The Honorable Debbie Wasserman Schultz
Ranking Member
Subcommittee on Legislative Branch
House Committee on Appropriations
1114 Longworth House Office Building
Washington, DC 20515

Dear Chairmen and Ranking Members:

I am writing on behalf of Intellectual Property Owners Association (IPO) in support of the Copyright Office's Provisional Information Technology Modernization Plan ("IT Plan") and to urge you to ask the Copyright Office to implement the IT Plan as soon possible, rather than waiting until FY 2018. The sooner that the IT Plan can be effectively started, the sooner that a modern Copyright Office can be established that will benefit the copyright community and the public.

IPO is an international trade association representing companies and individuals in all industries and fields of technology who own, or are interested in, intellectual property rights. IPO's membership includes more than 200 companies and more than 12,000 individuals. IPO membership spans 43 countries. IPO advocates for effective and affordable IP ownership rights and provides a wide array of services to members, including supporting member interests relating to legislative and international issues;

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analyzing current intellectual property issues; providing information and educational services; and disseminating information to the general public on the importance of intellectual property rights.

IPO generally supports the view expressed by Register Pallante that the Copyright Office needs to re-envision most of its services, including how customers register claims, submit deposits, record documents, share data, and access expert resources.”¹ IPO is pleased that the Copyright Office’s IT Plan seeks to modernize its systems in a way that more effectively and efficiently serves the needs of authors, users of copyrighted works, and the general public. We also appreciate that the IT Plan is targeted to meet the current and future needs of creators and the general public by minimizing costly infrastructure needs, embracing cloud services, and utilizing mobile technologies. Modernizing the Copyright Office IT system and giving the Office control over its IT system is essential to an effective and efficient twenty-first century Copyright Office.

IPO also hopes that the upgrades to the Copyright Office systems will be done at the direction of the Copyright Office itself and not through the Library of Congress. Appropriated funds for an upgrade should be separate and distinct from any funds that Congress appropriates to the Library of Congress for its technology systems. The Copyright Office should have full control over the decisions about how that money is used, including making its own IT decisions, selecting its own vendors, and making its own contracting and procurement decisions.

We appreciate your support for funding as soon as feasible for a new and improved Copyright Office that is essential to copyright as the engine of free expression and a significant building block of the national economy. Please let us know if IPO can be helpful as you decide how to proceed.

Sincerely,



Mark W. Lauroesch
Executive Director

cc: Senate Subcommittee on Legislative Branch members
House Subcommittee on Legislative Branch members
Hon. Bob Goodlatte, House Judiciary Committee Chairman
Hon. John Conyers, Jr., House Judiciary Committee Ranking Member
Hon. Charles Grassley, Senate Judiciary Committee Chairman
Hon. Patrick Leahy, Senate Judiciary Committee Ranking Member

¹ U.S. Copyright Office Announces Draft Strategic Plan for 2016-2020, NewsNet 598, Oct. 23, 2015, available at <http://copyright.gov/newsnet/2015/598.html>.