Submitted by Emily Feltren, Director of Government Relations

March 31, 2016

Ms. Maria Pallante
Register of Copyrights
United States Copyright Office
101 Independence Avenue S.E.
Washington, D.C. 20559

RE: Information Technology Upgrades for a Twenty-First Century Copyright Office (81 FR 10672, Docket No. 2016-2)

Dear Ms. Pallante:

AALL supports efforts to modernize the Copyright Office. Based on the Copyright Office’s own recent studies, reports from the Government Accountability Office (GAO), and the experiences of copyright stakeholders, it’s clear that the Copyright Office’s technological services have lagged far behind the industries it supports. Updating the technology used by the Copyright Office to provide more accessible services and improved back-end systems will benefit all users, including law libraries and the general public, by creating more functional systems for copyright owners and improving search capabilities. We commend the Library of Congress, the Copyright Office, and Congress for recognizing the urgent need to update the Copyright Office’s technology systems.

Recent steps taken by the Library – including establishing its new Office of the Chief Information Officer (OCIO), which focuses solely on information technology (IT) planning, management, and service delivery, and allowing the Copyright Office to select its own systems, with the Librarian’s approval – will significantly benefit not only the Copyright Office, but all stakeholders.

AALL believes that the IT staff responsible for implementing the Copyright Office’s comprehensive modernization efforts should report to the Copyright Office’s CIO, who should serve under the Library’s CIO. AALL envisions a small IT department embedded within the Copyright Office that is primarily responsible for modernization project implementation and ongoing technology maintenance, as the Copyright Office has requested. However, because the Copyright Office is a service unit of the Library, we believe accountability should ultimately rest with the LC CIO to ensure a comprehensive IT plan and to coordinate services (e.g. data security and storage) across the Library. This embedded approach would allow the Copyright Office the agility it needs to address issues as they occur, while maintaining a cohesive IT structure within LC.

AALL supports not only the use of collected fees to support modernization efforts within the Copyright Office, but also additional appropriations to best position modernization projects from the outset and support them once implemented. As the GAO Report from
March 2015\(^1\) noted, the Copyright Office needs to have robust technology systems to keep pace with and support its users. Doing so will require a significant expenditure at the outset to set up new systems per the plan offered by the Copyright Office. Technology is ever-evolving, and these systems must be maintained and continually upgraded to keep pace with technological advances and to adequately serve the Copyright Office’s many stakeholders.

AALL thanks the Copyright Office for proposing a robust modernization plan and for giving an opportunity for public comment.

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