



Copyright Review Board  
United States Copyright Office · 101 Independence Avenue SE · Washington, DC 20559-6000

May 3, 2024

Evan Everist, Esq.  
Dorsey & Whitney LLP  
50 South Sixth Street, Suite 1500  
Minneapolis, MN 55402

**Re: Second Request for Reconsideration for Refusal to Register ARRT Test Item Bank Through September 20, 2019 (SR # 1-8077435941; Correspondence ID: 1-4OUAYII)**

Dear Mr. Everist,

The Review Board of the United States Copyright Office (“Board”) has considered the American Registry of Radiologic Technologists’ (“ARRT”) second request for reconsideration of the Registration Program’s refusal to register a database claim in the work titled “ARRT Test Item Bank Through September 20, 2019” (the “Work”). After reviewing the application, the submitted deposits, and relevant correspondence, along with the arguments in the second request for reconsideration, the Board affirms the Registration Program’s refusal of special relief from the deposit requirements for a single-file database. On this basis, the Board likewise affirms the Registration Program’s refusal of registration.

## **I. DESCRIPTION OF THE WORK**

The Work is a database of test questions used to certify professionals in the fields of medical imaging, interventional procedures, and radiation therapy. ARRT claims text, artwork, photographs, and compilation authorship in the Work. ARRT deposited two 25-page documents in support of its claims, with each page containing a partially redacted exam question with annotations. An example page is provided on the next page.<sup>1</sup>

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<sup>1</sup> Because ARRT claims that the test questions constitute trade secrets, the Board has only reproduced a single page for the limited purpose of establishing a public record of its decision.

**Copyright Items 25 Oldest at 50% Black** 2

Item ID: 2      Exam Type: CV      Content Code: C.3.      Record ID: 7782  
Key: C      Min: 0      Max: 1      Question Type: Multiple Choice      Image ID:

A percutaneous access site for obtaining hep [REDACTED]

A: transp [REDACTED]  
B: transs [REDACTED]  
C: transj [REDACTED]  
D: transi [REDACTED]

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**CBT Stats as of: 9/24/2003 P+: 0.7009 R: 0.4509 Total: 214 Diff:**

	A	B	C	D	Prob:
Resp #:	51	2	150	11	
Mean:	73	77	79	73	

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**PNP Stats as of: 0799 P+: 0.5000 R: 0.5700 Total: 213 Diff:**

	A	B	C	D	Prob:
Resp #:	91	5	106	11	
Mean:	111	105	128	101	

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**Notes:** Keyed A & C for 0791. Option A revised for 1091. Keyed A, B, C & D for 0392. Option A revised for 0792. Stem revised for 1095. Stem revised per 1096 Comm. Stem revised for 0798. Stem revised for 0799.

**Reference:**

## II. ADMINISTRATIVE RECORD

On September 20, 2019, ARRT filed an application to register a copyright claim in the Work. On the application, ARRT provided the following note for the Copyright Office, seeking special relief from the Office’s deposit requirements for databases:<sup>2</sup>

Applicant requests special relief to submit a redacted deposit copy of the database content to preserve the trade secrets in the deposit. Per Section 1509.1(D)(2) of the Compendium, Applicant confirms [that] the work is a single-file database that does not require a descriptive statement. Copyright Notice: Before taking one of Applicant’s exams, which accesses the applied-for database, participants must

<sup>2</sup> Deposit requirements for non-photographic databases vary depending on several facts, including whether the database is new or revised, but all deposits submitted must be unredacted. *See* 37 C.F.R. § 202.20(c)(2)(vii)(D). Copyright applicants may request to submit deposits that are incomplete or otherwise different from the Office’s general deposit rules by submitting a request for special relief to the Director of the Office of Registration Policy and Practice. *See id.* § 202.20(d)(1), (3). The Office makes decisions to grant or deny special relief based on the Library of Congress’s acquisitions policies and the archival and examination requirements of the Office. *Id.* § 202.20(d)(2).

acknowledge that the questions in the database are confidential and protected by copyright law by clicking a “Yes” or “No” box. Participants may not take the exam unless they click the radio button next to “A” for “accept” or “N” for “not accept.”]

On January 10, 2020, a Copyright Office registration specialist contacted ARRT and explained that it needed to “submit a new, unredacted deposit comprising the first 25 and last 25 records” in the Work because, under the Office’s regulations, “[a] redacted deposit is an option only when registering the source code for a computer program or a mask work.” Email from U.S. Copyright Office to Elizabeth Buckingham (Jan. 10, 2020). ARRT replied, reiterating its request for special relief and providing five reasons for granting the request, including that public policy favors preventing cheating on medical exams and that the Office permits redacting trade secrets in deposits of other works such as secure tests. Email from Elizabeth Buckingham to U.S. Copyright Office (Feb. 20, 2020). The Office responded by informing ARRT that it would not grant special relief from the deposit requirement and therefore, “[i]n order to proceed with this registration, [ARRT] must submit fifty unredacted, representative pages or data records” from the Work. Email from U.S. Copyright Office to Elizabeth Buckingham (Mar. 4, 2020). After ARRT declined to do so, the Office formally refused registration on April 22, 2020, noting that it “could not grant special relief because there is no regulatory allowance for registering a database using redacted deposit material” and because ARRT had “not provided an acceptable copy of the work.” Initial Letter Refusing Registration from U.S. Copyright Office to Elizabeth Buckingham (Apr. 22, 2020). In the refusal letter, the Office noted that ARRT could reapply for registration by submitting a new application with an “unredacted copy of the work,” or could instead “appeal our refusal to register your claim as submitted.” *Id.*

On July 14, 2020, ARRT requested that the Office reconsider its initial refusal to register the Work and renewed its request for special relief, arguing that special relief is “appropriate and warranted” because it submitted “a lightly redacted deposit copy to protect a database containing highly confidential medical testing information.” Letter from Elizabeth Buckingham to U.S. Copyright Office at 1, 4 (July 14, 2020) (“First Request”). Similar to its previous correspondence with the registration specialist, ARRT again asserted five reasons for granting its request for special relief, including citing a previous Board decision and public policy arguments. *See id.* at 4–6.

After reviewing the Work in light of the points raised in the First Request, the Office reevaluated the claims and again concluded that the Work could not be registered. Refusal of First Request for Reconsideration from U.S. Copyright Office to Elizabeth Buckingham (Feb. 26, 2021). The Office explained that its decision to grant special relief from the deposit requirements is discretionary, with “each request for special relief [evaluated] on a case-by-case basis.” *Id.* at 2. The Office further noted that previous grants of special relief hold no precedential value and that the Office’s acceptance of redacted deposit copies containing trade secrets is generally limited to certain categories of works that are specifically identified in the Office’s regulations. *Id.* at 1, 2–4. The Office also addressed ARRT’s public policy arguments and various citations to the *Compendium of U.S. Copyright Office Practices, Third Edition*, concluding they did not support a grant of special relief. *Id.* at 4–5.

In a letter dated May 21, 2021, ARRT requested that, pursuant to 37 C.F.R. § 202.5(c), the Office reconsider for a second time its refusal to register the Work. Letter from Elizabeth

Buckingham to U.S. Copyright Office (May 21, 2021) (“Second Request”). As a threshold matter, ARRT argued that the Office “construed the special relief provision for deposit copies too narrowly” in its previous refusals to register the Work and provided several reasons why the provision should be read more broadly. *Id.* at 1, 4. First, ARRT asserted that special relief is “always intended” as a “practical, flexible standard,” noting that when special relief was first established, the Office intended it to cover cases where adhering to the normal deposit requirements “would impose an undue burden or cost on a copyright owner.” *Id.* at 4–5 (quoting Registration of Claims to Copyright Deposit Requirements, 42 Fed. Reg. 59,302, 59,304 (Nov. 16, 1977)). Second, ARRT contended that special relief from database deposit requirements is available, especially when the database contains trade secrets, and that the Office “specifically confirmed” this in a database rulemaking and prior versions of a *Circular*. *Id.* at 5–6 (citing and quoting Registration of Claims to Copyright; Registration and Deposit of Databases Proposed Regulations, 52 Fed. Reg. 37,167 (Oct. 5, 1987) and U.S. COPYRIGHT OFFICE, *Circular 65: Copyright Registration for Automated Databases* (May 2009)). Third, ARRT asserted that the Office’s rulemaking that established special relief from deposit requirements for computer programs containing trade secrets did not limit special relief to those works, but instead “confirmed the availability of special relief to prevent disclosure of confidential materials and in other circumstances not expressly covered by the new [computer source code] regulation.” *Id.* at 7–8 (citing Notice of Inquiry Deposit of Computer Programs and Other Works Containing Trade Secrets, 48 Fed. Reg. 22,951, 22,954 (May 23, 1983) and Registration of Claims to Copyright Deposit Requirements for Computer Programs Containing Trade Secrets and for Computer Screen Displays, 54 Fed. Reg. 13,173 (Mar. 31, 1989)). Fourth, ARRT posited that a previous Board decision, by considering a request for special relief to redact a deposit copy for a type of literary work other than a computer program, “implicitly rejected” the argument that applicants may only submit redacted deposit copies for certain computer programs. *Id.* at 8–9 (citing U.S. Copyright Office Review Board, *Decision Affirming Refusal of Registration of DRAFT PATENT APPLICATION ENTITLED DEFECT ANALYSIS USING CALIBRATED LENS* (Aug. 28, 2019) (“Calibrated Lens”), <https://www.copyright.gov/rulings-filings/review-board/docs/draft-patent-application.pdf>).

Applying its interpretation of the Office’s special relief provision, ARRT went on to advocate that it is entitled to such relief because the Work contains trade secrets and providing an unredacted deposit would cause undue hardship to both ARRT and the public. *See id.* at 9–12 (asserting that ARRT’s request is “rooted in the particular hardship it would suffer . . . and in the potential resulting impact on public health and safety”). ARRT explained that compliance with the normally applicable database deposit requirements would subject it to undue hardship because making an unredacted copy publicly available would “immediately compromise the validity of [test] questions.” *Id.* at 9–11. ARRT asserted that this was “problematic” for four reasons, including expending additional resources, such as time and money to track and produce test questions, potential exposure of its testing logic, and the potential to prevent consistent testing as there is “only a finite amount of material” it can cover on its exams and “only so many ways it can ask the same questions.” *Id.* In addition to causing ARRT undue hardship, ARRT asserted that granting special relief would prevent public hardship. *Id.* at 11–12. Specifically, ARRT contended that submitting an unredacted deposit copy would pose “a grave risk that nefarious individuals could attempt to obtain the [unredacted] deposit copies so they can cheat on

Applicant’s exams,” which in turn, could result in improper certification of medical professionals and impact public health and safety. *Id.*

### III. DISCUSSION

After carefully examining the submitted deposits and considering the arguments made in the First and Second Requests, the Board denies the request for special relief from the Office’s deposit requirements and affirms the refusal to register the Work.<sup>3</sup>

Before turning to its analysis of ARRT’s Second Request, the Board acknowledges that the subject of ARRT’s special relief request—registration requirements for secure tests—is currently under consideration by the Office as part of an ongoing rulemaking. *See Secure Tests*, 88 Fed. Reg. 35,741 (June 1, 2023) (fifth interim rule). The Office has long recognized that the unique equities of secure tests justify different examination and deposit practices in some cases. *See Secure Tests*, 88 Fed. Reg. at 35,741–42 (explaining that since 1978 the Office has had special procedures for examining secured tests, “[r]ecognizing the confidential nature of secure tests and that the availability of deposits through public inspection could undercut their utility”). The Office also understands the desire of copyright owners, such as to ARRT, to obtain even greater flexibility in its registration requirements. Its ongoing secure tests rulemaking is currently examining these issues. *See Secure Tests*, 88 Fed. Reg. at 35,743 (explaining that the Office will “evaluate[] whether and under what conditions remote testing should be permitted under the final rule addressing secure test”).

ARRT is a participant in the Office’s open rulemaking. It submitted two comments to the Office, which remain under consideration.<sup>4</sup> The First and Second Requests assert arguments and concerns also raised by ARRT in these public comments.<sup>5</sup> For example, ARRT argues that it should be granted special relief because the public can inspect copyright deposits and making unredacted test questions available would cause hardship, such as allowing unqualified individuals to obtain test questions and wrongfully obtain a medical certification, as well as cause the questions to lose trade secret protection.<sup>6</sup> As part of this argument, ARRT points to a district court decision finding its test questions were protected as trade secrets. *See Second Request* at 12 (discussing *Am. Registry of Radiologic Technologists v. Bennett*, 939 F. Supp. 2d

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<sup>3</sup> Because the request for special relief is denied, the Board declines to address ARRT’s request to update the Work’s title to “ARRT Test Item Bank Through April 16, 2020.” *Second Request* at 12.

<sup>4</sup> *See ARRT Comments on 2017 Secure Tests Interim Rule*, Docket No. 2017-8 (Mar. 30, 2018), <https://www.regulations.gov/comment/COLC-2017-0005-0037>; *ARRT Comments on 2023 Secure Tests Interim Rule*, Docket No. 2017-8 (June 30, 2023), <https://www.regulations.gov/comment/COLC-2017-0005-0059>.

<sup>5</sup> Last year ARRT submitted a comment that the Office should amend the definition of “secure test” to permit all exams that are “administered online” and accept deposits containing redacted test questions because “governmental agencies are the target of hacking and malware.” *ARRT Comments on 2023 Secure Tests Interim Rule* at 8, Docket No. 2017-8 (June 30, 2023), <https://www.regulations.gov/comment/COLC-2017-0005-0059>.

<sup>6</sup> For example, ARRT argued that submitting an unredacted deposit would expose ARRT’s “testing logic” and prevent “consistent testing” due to the “finite amount of material” that can be included in ARRT’s exams. *Second Request* at 10. Regarding perceived public hardship, ARRT argued that without special relief, bad actors may attempt to obtain the unredacted deposit copies from the Office to cheat on ARRT’s exams or sell the exams to others, which could result in improper certification of medical professionals. *First Request* at 5; *Second Request* at 11. Improper certification, ARRT states, would not “ensure that the health care professionals performing . . . procedures are qualified and knowledgeable” and therefore, may “subject patients to a heightened risk of injury of death.” *First Request* at 5; *Second Request* at 11.

695, 712 (W.D. Tex. 2013)). These issues are within the scope of the Office’s open rulemaking and were raised by ARRT in that rulemaking. The Board is sympathetic to these concerns, which have also been raised by similarly situated applicants seeking to register their remotely administered tests. However, the Board must assess ARRT’s request for special relief and its registration applicant under current law and existing regulations.

When registering a work with the Copyright Office, applicants must submit a complete application, filing fee, and appropriate deposit. 17 U.S.C. § 408(a). In general, registration deposit requirements are proscribed by statute. *See id.* § 408(b). For certain classes of works, however, the Register has authority to establish regulations regarding “the nature of [deposit] copies.” *Id.* § 408(c)(1). An applicant wishing to register a database, for example, must satisfy certain deposit requirements depending on whether the applicant intends to register a revised database and whether the database contains a single data file or multiple data files.<sup>7</sup> *See* 37 C.F.R. § 202.20(c)(2)(vii)(D); *see also* U.S. COPYRIGHT OFFICE, COMPENDIUM OF U.S. COPYRIGHT OFFICE PRACTICES § 1509.1(G)(2) (3d ed. 2021) (“COMPENDIUM (THIRD)”) (listing the specific deposit requirements for databases). ARRT does not contend here that it has satisfied the regulatory requirements for a revised database.

Instead, ARRT seeks special relief from the regulatory requirements for revised databases and asks to be permitted to comply instead with the Office’s regulatory requirements for the registration of secure tests. If the Work qualified for registration as a secure test, ARRT could submit an online application, a redacted deposit copy of the entire test, and a brief questionnaire about the test through the Office’s electronic registration system. *See* 37 C.F.R. § 202.13(c)(2). This would allow the Office to examine an unredacted copy of the full Work while retaining a redacted copy for the public record. *See id.* But the Work is not eligible as a secure test because such works are only those administered at “specified centers”—“a place where test takers are physically assembled at the same time.” *Id.* § 202.13(b)(4); *see also* Secure Tests, 82 Fed. Reg. 26,850, 26,852 (June 12, 2017) (explaining that a “‘test’ administered via a Web site to people located in their individual homes or offices” would not qualify as a “specified center”). Because ARRT administers both in-person testing *and* online remotely proctored testing, the Work does not meet the requirements under the current secure tests rule, specifically the definition of “specified centers.” *See* 37 C.F.R. § 202.13(b)(4). ARRT acknowledges that it “offers online, remotely proctored versions of its exams.” Second Request at 2; *see also* First Request at 2 (same). Therefore, ARRT must either register the Work in unredacted form or receive a grant of special relief from the database deposit requirements.

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<sup>7</sup> The Office has different registration and deposit requirements when an applicant seeks to register a “brand new database, never previously published or registered” or a “specific version of a revised database.” *Copyright Registration of Automated Databases*, U.S. COPYRIGHT OFFICE, <https://www.copyright.gov/non-photographic-databases/help-text.pdf> (last visited May 2, 2024); *see also id.* (discussing the Office’s group registration option to “to register up to three months of updates [to a database] with a single application”). A “revised database” is a database that, for example, contains “sufficient original or creative compilation authorship” separate from a previous version of the database applicant now seeks to register, and requires an applicant to deposit, among other things, “[f]ifty representative pages of complete data records or fifty complete data records that were added to or modified in that version; i.e., primarily new content.” *Registering One Version of a Non-Photographic Database*, U.S. COPYRIGHT OFFICE, <https://www.copyright.gov/non-photographic-databases/register-one.html> (last visited May 2, 2024).

The Office does have regulatory authority to grant special relief from the registration deposit requirements in limited circumstances. *See* 37 C.F.R. § 202.20(d) (listing the four types of special relief the Office may grant). Each decision to grant special relief, however, is discretionary and conducted on a case-by-case basis, with prior decisions to grant special relief having no precedential value on future decisions. *See* Deposit Requirements, 43 Fed. Reg. 41,975, 41,976 (Sept. 19, 1978) (clarifying that absent ongoing or continuous grants, special review is “inten[ded]” to be considered “on a case-by-case basis”); *see also* COMPENDIUM (THIRD) § 1508.8(B) (noting that if a request for special relief is denied, the applicant must submit an acceptable deposit or “the Office may refuse to register the claim”).

Copyright registration is designed for the Office “to compile a public record of copyright claims, and the deposited copies provide definitive evidence of what the work was at the time of registration.” *See* Brief for the United States as Amici Curiae Supporting Respondents at 31–32, *Fourth Estate Pub. Ben. Corp. v. Wall-Street.com, LLC*, 139 S. Ct. 881 (2019) (No. 17-571) (citing 17 U.S.C. § 704(a) and (b)). The public record “serve[s] as a valuable resource” and lets the public know a work’s copyright status. *Id.* at 32. Redaction, however, inhibits the Office’s ability to offer a comprehensive public record of copyright registrations. For this reason, the Office is generally hesitant to allow redaction of such information and has declined to adopt a broad regulatory exception to its deposit requirements for works containing trade secrets. *See* Registration of Claims to Copyright; Deposit Requirements for Computer Programs Containing Trade Secrets, 51 Fed. Reg. 34,667, 34,667–68 (Sept. 30, 1986) (“[T]he Copyright Office has concluded that a case has not been made for establishment of a broad deposit exemption covering all material which could conceivably contain trade secrets.”). Instead, the Office has promulgated regulations that permit redacted deposit copies for certain works containing trade secrets only in specific, limited situations, *see* 37 C.F.R. §§ 202.13(c), 202.20(c)(2)(vii)(A)(2).<sup>8</sup> Consistent with the limited nature of these regulatory exceptions to the deposit requirements, the Office also generally does not grant special relief from these requirements for the purpose of redacting trade secret or confidential information from the public record, much less automatically grant such requests. *See* Registration of Claims to Copyright; Deposit Requirements for Computer Programs Containing Trade Secrets, 51 Fed. Reg. at 34,667–68.

After reviewing the application materials and Office’s regulations, the Board concludes that the Work is not entitled to special relief.<sup>9</sup> While the Board recognizes ARRT’s concern that the deposit requirements for databases does not permit redaction, granting special relief in this case would open the door for a broad exception for other applicants seeking to register exam questions who do not meet the requirements to register them as secure tests. Special relief is a way for the Office to accommodate “individual cases” where circumstances unique to an

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<sup>8</sup> *See also* Registration of Claims to Copyright; Deposit Requirements for Computer Programs Containing Trade Secrets, 51 Fed. Reg. 34,667–68 (Sept. 30, 1986) (confining the notice of proposed rulemaking to computer programs, as opposed to all classes of works, given that the computer industry was facing “particular problems” that “merit[ed] special attention,” including “extensive use” of the special relief provisions “to avoid making a deposit that reveals trade secrets”); Registration of Claims to Copyright Deposit Requirements, 42 Fed. Reg. 59,302, 59,304 (Nov. 16, 1977) (When proposing the initial regulatory language, the Office took careful consideration of the “special [confidentiality] problems” faced by secure test creators and administrators.); Secure Tests, 82 Fed. Reg. 52,224, 52,225 (Nov. 13, 2017) (explaining the history of secure test registration procedures).

<sup>9</sup> While the request for reconsideration was directed to the Board, decisions on whether to grant special relief “and the conditions under which special relief” are granted belong to the Register of Copyrights. 37 C.F.R. § 202.20(d)(2). The Register of Copyrights has reviewed and ratified the Board’s decision here.

applicant or a work justified a departure from the Office’s regulations governing registration deposits. *See* Registration of Claims to Copyright Deposit Requirements, 42 Fed. Reg. at 59,304 (noting that such circumstances include “unnecessary hardship” or an “undue burden or cost on the copyright owner,” such as where “a photocopy or ‘lesser’ edition of a work may be sufficient where the ‘best edition’ is no longer available”). This is not the case here, where ARRT’s request for special relief is not due to circumstances unique to the individual Work but is predicated on a category of works—tests proctored virtually rather than in a physical testing center—that do not currently qualify as secure tests under the Office’s current regulations. If the Board were to grant special relief in this case, applicants for other materials that do not qualify as secure tests would seek the same treatment. Special relief is not a vehicle for categorical exemptions from the registration deposit requirements in the Office’s regulations.<sup>10</sup>

Finally, the Board is not persuaded by ARRT’s contention that the reasoning in a previous Review Board decision supports granting special relief here. *See* COMPENDIUM (THIRD) § 309.3 (registrations decisions are case-by-case and have “no precedential value”). In its Second Request, ARRT cites the Board’s decision in *Calibrated Lens*, where the Board affirmed the refusal to register a claim for a draft patent application with a deposit that was almost entirely redacted. ARRT argues that because the “Board did not . . . consider the examiner’s second ground for rejection (*i.e.*, that redaction is available only to computer program deposits)” in reaching its decision, “the Board implicitly rejected this argument,” and therefore special relief can be used to provide redacted deposits for works other than computer programs. Second Request at 8; *see* First Request at 4–5 (same). We disagree with ARRT’s interpretation; our decision simply acknowledged that the Office was provided with an “almost completely redacted” and “partially redacted” deposit, neither of which contained sufficient authorship to be protected by copyright. *Calibrated Lens* at 2–4. The decision here is not inconsistent with the Board’s previous treatment of this issue.<sup>11</sup>

Because the Board denies ARRT’s special relief request, it necessarily affirms the Office’s refusal to register ARRT’s copyright claim in the Work for failing to comply with the Office’s deposit requirements. As noted above, the Office’s open rulemaking on secure tests is considering changes to its regulations for these works and is evaluating the issues raised by ARRT as part of that rulemaking.

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<sup>10</sup> As discussed further below, categorical concerns about the examination of test materials are more properly addressed through the Office’s ongoing rulemaking on secure tests.

<sup>11</sup> The present case is analogous to the Board’s decision in *Three Facebook Tests*. U.S. Copyright Office Review Board, *Decision Affirming Refusal of Registration of 310-101 Facebook Advertising Core Competencies, 321-101 Facebook Certified Buying Professional, and 322-101 Facebook Certified Planning Professional* (Feb. 25, 2020), <https://www.copyright.gov/rulings-filings/review-board/docs/three-facebook-tests.pdf>. Similar to ARRT, Facebook argued that the Board should permit the registration of redacted works as secure tests because otherwise Facebook would be “require[ed] to forgo confidentiality” over its test questions. *Id.* at 2. The Board affirmed the refusal to register, noting that the works did not qualify as secure tests under the Office’s interim rule because the exams were “proctored via webcam.” *See id.* at 4.



#### IV. CONCLUSION

For the reasons stated herein, the Review Board of the United States Copyright Office affirms the Registration Program's refusal of special relief and affirms the refusal to register the copyright claim in the Work. Pursuant to 37 C.F.R. § 202.5(g), this decision constitutes final agency action in this matter.



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**U.S. Copyright Office Review Board**

Suzanne V. Wilson, General Counsel and Associate  
Register of Copyrights

Maria Strong, Associate Register of Copyrights and  
Director of Policy and International Affairs

Mark T. Gray, Assistant General Counsel