



Long Comment Regarding a Proposed Exemption Under 17 U.S.C. § 1201

Please submit a separate comment for each proposed class.

[X] Check here if multimedia evidence is being provided in connection with this comment

ITEM A. COMMENTER INFORMATION

DVD Copy Control Association

The DVD Copy Control Association (“DVD CCA”), a not-for-profit corporation with its principal office in Morgan Hill, California, licenses the Content Scramble System (“CSS”) for use in protecting against unauthorized access to or use of prerecorded video content distributed on DVD discs. Its licensees include the owners of such content and the related authoring and disc replicating companies; producers of encryption engines, decrypters (hardware of software); and manufacturers of DVD players and DVD-ROM drives.

Advanced Access Content System Licensing Administrator

Advanced Access Content System Licensing Administrator, LLC (“AACS LA”), is a cross-industry limited liability company with its principal office in Beaverton, Oregon. The Founders of AACS LA are Warner Bros., Disney, Microsoft, Intel, Toshiba, Panasonic, Sony, and IBM. AACS LA licenses the Advanced Access Content System (“AACS”) technology that it developed for the protection of high-definition audiovisual content distributed on optical media, primarily Blu-ray Discs. AACS LA’s licensees include the owners of such content and the related authoring and disc replicating companies; producers of encryption engines, decrypters (hardware of software); and manufacturers of Blu-ray Disc players and Blu-ray Disc drives.

As ultra-high-definition products gain popularity in the marketplace, AACS LA has developed a separate technology for the distribution of audiovisual content in ultra-high-definition digital format. This technology is identified as AACS2, and not AACS 2.0. This distinction in

nomenclature is significant, as the latter would suggest that AAC2 is a successor version of the technology which has replaced AAC as distributed on Blu-ray Discs. It has not. AAC2 is a distinct technology that protects audiovisual content distributed on Ultra HD (UHD) Blu-ray Discs, a newer, distinct optical disc format which will not play on legacy (HD) Blu-ray Disc players. To the extent a proposal mentions CSS and/or AAC, but does not explicitly include AAC2, such mention should not be inferred to include AAC2.

Proponents here do not identify UHD Blu-ray Discs or AAC2 in their discussion of relevant technological protection measures. Initial Comments at 19. In fact, Proponents make no mention of either CSS and/or AAC. Instead, they state that the “the proposed expansion does not materially alter . . . the current exemption.” *Id.* The current exemption is only applicable to CSS and AAC. *See* 37 C.F.R. § 201.40(b)(4).

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ITEM B. PROPOSED CLASS ADDRESSED

Proposed Class 3(a) Motion Pictures—Text and Data Mining: Lawfully accessed motion pictures where circumvention is undertaken in order to deploy text and data mining techniques.

ITEM C. OVERVIEW

DVD CCA and AAC LA object to the expansion of the exemption. The exemption already permits certain text and data mining, conduct that could just as well be licensed. Proponents now suggest that the exemption should be expanded to allow the widespread sharing

of a researchers’ corpus of circumvented works. However, even setting aside, arguendo, that the sharing of a corpus of circumvented motion pictures is clearly noninfringing, with the benefit of hindsight and the specific description of text and data mining, close viewing, presented in this record, the Proponents and their researchers are clearly not ready for such a bold step.

ITEM D. TECHNOLOGICAL PROTECTION MEASURE(S) AND METHOD(S) OF CIRCUMVENTION

The TPMs of concern to DVD CCA and AACS LA are the Content Scramble System (“CSS”) used to protect copyrighted motion picture content on DVDs and the Advanced Access Content System (“AACS”) used to protect copyrighted motion picture content on Blu-ray Discs.

ITEM E. ASSERTED ADVERSE EFFECTS ON NONINFRINGING USES

Outline of Discussion

I. INTRODUCTION1

II. CLOSE VIEWING IS NOT AUTHORIZED1

A. Current “Close Viewing” Text and Data Mining1

1. Annotating.....2

B. Annotating a Motion Picture Is Likely Infringing.....2

1. First Fair Use Factor Weights Against Fair Use.....3

a) Annotating is Not Sufficiently Transformative3

b) Text and Data Mining Precedent Limits Viewing5

2. Amount and Substantiality of the Use Weighs Against Fair Use.....6

a) Copying and Annotating for Education Purposes Is Limited to Short Portions6

b) Creating a Searchable Database of Clips Does Not Excuse the Copying and Annotation of the Entire Motion Picture.....8

(1) Snippet View Feature8

(2) These Clips Are More than Snippets.....9

(3) The Researchers’ Amount and Use of Clips Are Excessive9

(4) This Ready Availability of Clip Offerings on Kinolab Is Indeed Troubling.....10

| | | |
|-------------|---|-----------|
| 3. | The Harm to the Market for the Work | 11 |
| III. | SHARING A CORPUS SHOULD NOT BE AUTHORIZED | 12 |
| A. | The Proposed Sharing | 12 |
| 1. | The Proponents Are Inconsistent About the Scope of the Expansion | 12 |
| 2. | Researchers Are Already Sharing Their Corpus without Any Pretense of Collaboration | 14 |
| 3. | The Corpus is Not Subject to Any Limitations..... | 15 |
| a) | Site Users Do Not Need to Be Affiliated with Bowdoin College..... | 15 |
| b) | Having a Copy of the Film in the Educational Institutions’ Libraries Is Not a Requisite to Making Use of Kinolab’s Corpus..... | 16 |
| c) | Site Users Can View the Clips as the Clips Are Fully Performed..... | 16 |
| d) | Kinolab Does Not Employ TPMs to Prevent Further Dissemination of Clips..... | 17 |
| B. | Sharing A Corpus Is Not Fair Use | 18 |
| 1. | The Proposal Exceeds the Use Permitted under Relevant Precedent. | 18 |
| 2. | The Request Would Go Beyond the Statutory Limitation Requiring Exemptions from This Rulemaking to Apply Only to Those Beneficiaries Specifically Determined Pursuant to the Rulemaking..... | 19 |
| 3. | The Proposed Class is Impermissibly Broad | 19 |
| IV. | THE CIRCUMVENTION PROHIBITION HAS NOT CAUSED THE ALLEGED HARM | 20 |
| A. | Copyright Law Limits Sharing..... | 21 |
| B. | Resources | 21 |
| 1. | Expense of Conducting Research | 21 |
| 2. | Some Alleged Costs Seem to Reflect a Learning Curve | 21 |
| 3. | Costs Are Due to Unauthorized Uses | 22 |
| 4. | Attrition and Turnover in Students | 23 |
| V. | CONCLUSION | 23 |

I. Introduction

The proposed expansion of the current exemption should be rejected. The currently broad exemption allows for *certain* text and data mining (TDM) for scholarly research and teaching by a nonprofit institution of higher education when the corpus is created from the university's own collection of lawfully-acquired copies of the work and that corpus has viewing limitations. The expansion of the exemption – notwithstanding Proponents' assertions to the contrary – would relieve researchers of such a requirement. The exemption would then not only negate any licensing incentives, as it already significantly impairs now, but would also remove copyright owners completely from the distribution channel, negating their right to be compensated from the initial sale of copies of the work.

Proponents urge the Register to rush to establish new precedent in an unsettled area of the law. However because much of the justification for the expansion of the exemption is predicated on close-viewing – a form of text and datamining that is not authorized under the current exemption, DVD CCA and AACCS LA instead urge the Register to reject the requested expansion of the exemption.

II. Close Viewing Is Not Authorized

A. Current “Close Viewing” Text and Data Mining

Close viewing is an activity not authorized under the current exemption. Further, any justification to expand the exemption cannot permissibly rely on an activity not authorized by the current exemption. According to Proponents, employing text and data mining techniques to motion pictures in a corpus can apparently be distinguished as either “distant viewing” or “close viewing”. Distant viewing emphasizes the at-scale computational analysis of digital images through machine learning. *Id.* at 1. Close viewing, instead, relies on the work of users, who

annotate the scenes as they watch the motion pictures. The current text and data mining permits the former (distant viewing) and not the latter (close viewing).

1. Annotating

By Proponents' own explanation, close viewing inherently includes annotating motion pictures. The most salient examples of annotating arise from the use made by Allison Cooper at Bowdoin College and Joel Burges at University of Rochester, who are both described as engaging in circumvention of DVDs and Blu-ray Discs for the purpose of annotation. *See* Initial Comments, App. E at 2 ("Cooper and Burges were careful to be the ones breaking the encryption on DVDs and Blu-rays before sharing digitized copies for annotation in Mediate with students."). The Mediate platform enables *close* viewing which "involves human users manually annotating audiovisual materials to produce data about media such as film and television." *Id.* at 1. Burges notes, "Working together across campuses, Bowdoin and [University of Rochester] students annotated groups of films about which they had a research question, uploading the films onto the platform and generating data about the formal elements of their film language." *Id.* at 2.

Cooper, from Bowdoin College, offers an explanation of the annotation done on the Kinolab platform.

Our student curators transcode DVDs once they have been acquired, watch them carefully, take notes that are shared with the entire research team, pull clips of scenes that highlight the close-up's foregrounding of identity, annotate them with tags from specialized annotation schema developed by the project's lead researchers, and, finally, present their work for discussion and peer review in the aforementioned weekly curatorial meetings before adding brief text descriptions to each clip and uploading it to our database.

Id., App. G at 2.

B. Annotating a Motion Picture Is Likely Infringing.

While close viewing is not authorized under the current exemption, the activity, itself, particularly as described by Proponents, is infringing.

1. The First Fair Use Factor Weights Against Fair Use

Annotating a motion picture is not sufficiently transformative. For the purpose of annotating the film, the researchers' space-shift the circumvented motion pictures to their respective platforms, such as Mediate and Kinolab, merely to view and describe the scenes of the motion picture. At the outset, the nature of this use, *i.e.*, space-shifting to allow for annotation, plainly implicates and impinges, among others, the right of the copyright owners to create derivative works. 17 U.S.C. §§ 101, 106. Indeed, simple viewing and annotation, alone, cannot render space-shifting copyright protected works non-infringing.

a) *Annotating is Not Sufficiently Transformative*

Annotations describing scenes of a copyright protected motion picture is clearly insufficiently transformative. For instance, in *Warner Brothers Entertainment Inc. v. RDR Books*, 575 F. Supp. 2d 513 (S.D.N.Y. 2008), the court considered a Harry Potter lexicon that described the Harry Potter books.

The Lexicon entries cull every item and character that appears in the Harry Potter works, no matter if it plays a significant or insignificant role in the story.

...

Each entry, with the exception of the shortest ones, gathers and synthesizes pieces of information relating to its subject that appear scattered across the Harry Potter novels, The types of information contained in the entries include descriptions of the subject's attributes, role in the story, relationship to other characters or things, and events involving the subject.

575 F. Supp at 525.

Even though the court considered the challenged lexicon to be a reference guide that was

more transformative than uses made in other leading cases, including *Castle Rock*,¹ *Twin Peaks*² and *Paramount Pictures*,³ the court still found the nature of the use to be insufficiently transformative, due to the failure to minimize the expressive value of the original work while engaging in verbatim copying. 575 F. Supp. 2d at 544. Copying more than what is “reasonably necessary diminishes a finding of a transformative use.” *Id.* (citing *Campbell*, 510 U.S. at 587, 114 S. Ct. 1164 (observing that “whether a substantial portion of the infringing work was copied verbatim from the copyrighted work . . . may reveal a dearth of transformative character”)) (internal quotations omitted). As the below discussion of the third factor demonstrates, the researchers’ annotation process seems to be far more extensive than copying a short portion. Instead, the annotation process apparently involves copying the entire work.

Copying which is allegedly for nonprofit educational use is not automatically noninfringing. *See Campbell*, 510 U.S. at 584, 114 S. Ct. 1164 (“[T]he mere fact that a use is educational and not for profit does not insulate it from a finding of infringement . . .”).

Nor should the eventual use of the work for text and data mining purposes insulate the copying of an entire work from being deemed infringing. In *Los Angeles News Services v. Reuters Television International*, 149 F.3d 987 (9th Cir. 1998), the court considered the argument that the ultimate broadcasting of the plaintiff’s copyrighted tapes by a news outlet made the defendants’

¹ *Castle Rock Entm’t, Inc. v. Carol Publ. Group, Inc.*, 150 F.3d 132 (2nd Cir. 1998) (holding that a trivia book for fans of the *Seinfeld* television series was not fair use as it was not transformative but repackaged the *Seinfeld* series to entertain fans).

² *Twin Peaks Prods., Inc. v. Publ’ns Int’l, Ltd.*, 996 F.2d 1366 (2nd Cir. 1993) (holding a book titled *Welcome to Twin Peaks: A Complete Guide to Who’s Who and What’s What* that recounted the show’s plotlines beyond mere outline was not transformative, but an abridgment protected as a derivative work).

³ *Paramount Pictures Corp. v. Carol Pub. Group*, 11 F. Supp. 2d 329, 335 (S.D.N.Y. 1998) (finding a book titled *The Joy of Trek* “simply retells the story of *Star Trek* in a condensed version”).

copying of the tapes fair use. There, the defendant news outlet videotaped copies of plaintiff's initial broadcast (space-shifting the copyrighted content) onto its own tapes (defendants' preferred format), which copied tapes were then ultimately transmitted by defendants. The *Reuters* Court explained that plaintiff's "argument misses the point for it is not the transmission [of plaintiff's tapes by a news outlet] that is the infringement but the unauthorized copying of the works." *Reuters*, 149 F.3d at 994. Here, researchers are, analogous to the defendants in *Reuters*, space-shifting works to a preferred format to annotate it and then subsequently extract clips. The use of such subsequent clips for text and data mining is clearly separate and apart from the copying (*i.e.*, the space-shifting).

b) Text and Data Mining Precedent Limits Viewing

The precedent of this proceeding has considered and rejected this very issue. Proponents had, for much of the prior proceeding, represented to the Office that employing text and data mining techniques would not require any viewing of the circumvented works. These representations, however, changed by the end of the proceeding, such that the Register was compelled to recognize Proponents were indeed looking to view the circumvented works. *See* 2021 Recommendation at 110. The Register ultimately accommodated the Proponents' belatedly admitted need to view the works, but only to verify results.

[The] Register recommends adding a limitation that researchers would be permitted to view or listen to the copyrighted works solely to verify research results, which will ensure that the purpose of the use differs from the original expressive purposes for which the works were created.

2021 Recommendation at 121-22.

Indeed, viewing the work solely to verify the research results was significant to the Register's analysis of the first fair use factor. *Id.* at 111 ("first factor weighs in favor of fair use because the proposed use is noncommercial and, with this limitation, likely to be found

transformative”). Here, annotating involves far more than viewing the work merely to verify results. Researchers are space-shifting the entire work to their preferred platform and viewing and annotating the work in its entirety. Therefore, the first fair-use factor weighs against Proponents close-viewing activity.

2. Amount and Substantiality of the Use Weighs Against Fair Use

a) *Copying and Annotating for Education Purposes Is Limited to Short Portions*

The precedent of this proceeding favoring the use of only short portions of motion pictures is predicated on the proposition that copying a short portion of a work is more likely to be a noninfringing fair use than copying a longer portion (or even the entire work). In the 2018 Recommendation, the Acting Register explained:

[T]he limitation to circumvention for uses of “short portions” of motion pictures is integral to the various proposals. While recognizing that the extent of permissible copying may vary, for purposes of this class, the “short portions” limitation provides useful guidance as to what is generally likely to be a fair use without imposing a wholly inflexible rule as to length. As a general matter, longer uses are less likely to be considered fair because they are more likely to usurp the market for a work.⁴

The “short-portions” limitation has been in place for all of the current exempted uses of motion pictures since the 2012 Recommendation.

Even the 2012 Recommendation recognized that such educational uses were still subject to this fundamental precept:

Under the third fair use factor, an essential component of the proposals is that only a short portion of the work is used. The record evidence suggests that most of Proponents’ cited uses involve only brief portions of the underlying work. . . the evidence demonstrates that, . . . not only is each relevant clip very short (rarely longer than a few seconds), but even multiple clips from the same motion picture, when used together, comprise an extremely small fraction of the entirety of the source material. In relation to a typical movie of perhaps 120 minutes, the excerpts are a quantitatively small amount, comparable to brief quotations from a book . . .

⁴ 2018 Recommendation at 46 (footnote reference omitted).

. The record indicates that, in educational settings, the proposed uses are also usually short relative to the length of the entire work.

2012 Recommendation at 128-29.

More recently, the Register has rejected proposals seeking to copy and use an entire motion pictures for educational purposes in the digital environment. After concluding that the education exceptions were not applicable,⁵ the Registered considered whether digital copies of whole motion pictures used for digital performances could be warranted under fair use. She noted that there is no case law that supports the proposition that “ripping and librarying copies for educational uses are likely to be fair under Section 107”⁶

Here researchers Burges and Cooper are space-shifting circumvented motion pictures to their platform so that students can annotate them. Both examples suggest that the viewing is more than a short portion of the motion picture. In fact, Cooper describes her purportedly noninfringing use as employing a process where the entire movie is viewed and annotated and then clips of undetermined length are made on an as-needed basis.

Kinolab's largest expenditure for this kind of project is on training student curators to closely watch media and reliably identify and annotate aspects of film language like the close up, along with complex forms of identity representation, Our student curators transcode DVDs once they have been acquired, watch them carefully, take notes that are shared with the entire research team, pull clips of scenes that highlight the close-up's foregrounding of identity, annotate them with tags from specialized annotation schema developed by the project's lead researchers.

⁵ The Register explained that, while the classroom exception permits the performance of the entire work under Section 110(1), the copies, implicating the reproduction and distribution rights, required for the performance in a digital transmission are indeed limited only to those performances permitted under the TEACH Act. 2018 Recommendation at 49-50 (“On its face, Section 112(f) does not permit nonprofit educational institutions to make copies to facilitate performances under Section 110(1).”). Thus, under Section 112(f), copies enabling transmissions (i.e., the making and temporarily storing of digital copies) are only noninfringing when the copies facilitate “reasonable and limited portions” of the motion pictures.

⁶ The Register also discussed the favored cases Proponents advance now. That discussion however was *dicta* and explained why they did not permit space-shifting.

Initial Comments, App. G at 2. This process is clearly making use of far more than a short portion of the work.

b) *Creating a Searchable Database of Clips Does Not Excuse the Copying and Annotation of the Entire Motion Picture*

The building of a corpus of clips that are readily streamable and downloadable as researchers have done here, neither justifies the space-shifting done to view and annotate the motion pictures nor the incorporation of the clips into the corpus, as these uses far exceed what has been allowed under the relevant precedent established in *Authors Guild v. Google, Inc.*, 804 F.3d 202 (2nd Cir. 2015) (“*Google Books*”). In *Google Books*, the court found that Google’s copying and use of entire books were tolerable because “[Google’s platform] does not reveal the digital copy to the public.” *Google Books*, 804 F.3d at 221-22. Instead, Google limited access to the work by the snippet view feature.

(1) Snippet View Feature

The snippet feature provided very limited viewing of the work containing the searched text. For example, if a search for specific text was found on a page of 24 lines, then the result of the search would reveal no more than those 3 lines around the search term. *Google Books*, 804 F.3d at 209-210. These 3-lines around the search term were the snippet, “ordinarily an eighth of a page.” *Id.* at 209. According to the court, the snippet function helped users to know whether a book should be obtained or not.

For example, a searcher seeking books that explore Einstein's theories, who finds that a particular book includes 39 usages of "Einstein," will nonetheless conclude she can skip that book if the snippets reveal that the book speaks of "Einstein" because that is the name of the author's cat. In contrast, the snippet will tell the searcher that this is a book she needs to obtain if the snippet shows that the author is engaging with Einstein's theories.

Google Books, 804 F.3d at 218. These “tiny snippets . . . provided just enough context . . . to help evaluate” the search result. *Id.*

(2) These Clips Are More than Snippets

The researchers' clips are far more than snippets. The snippets in *Google Books* provided just enough information to assist the user in deciding whether the user needed to obtain a book (*i.e.*, the search function and the snippet view did not eliminate the user's next step to obtain the book). Searches on the researchers' platforms, however, serve up clips long enough that they eliminate that next step (*i.e.*, the clips themselves deliver enough of the expressive work that no further investigation is necessary as to the relevant term and that motion picture). This distinction becomes more apparent as the amount and use of the clips are examined below.

(3) The Researchers' Amount and Use of Clips Are Excessive

Here, researchers do not impose any limitations such as a snippet feature on their corpora of clips.

In this new era of text and datamining, the third factor has evolved to consider the amount and substantiality of the portion used that is accessible to the public and whether what is made accessible is a competing substitute.

Without doubt, enabling searchers to see portions of the copied texts could have determinative effect on the fair use analysis. The larger the quantity of the copyrighted text the searcher can see and the more control the searcher can exercise over what part of the text she sees, the greater the likelihood that those revelations could serve her as an effective, free substitute for the purchase of the plaintiff's book. We nonetheless conclude that, at least as presently structured by Google, the snippet view does not reveal matter that offers the marketplace a significantly competing substitute for the copyrighted work.

Google Books, 804 F. 3d at 222.

Google intentionally constructed the snippet feature in a manner to substantially protect against the digital copies in the corpus serving as an effectively competing substitute for the same books offered in the marketplace. The researchers here have not provided similar protections. In fact, some of the most memorable scenes in motion pictures are readily offered on the Kinolab

corpus including: *Citizen Kane: Rosebud Reveal* (Exhibit 1); *Psycho: Shower Scene* (Exhibit 2); *The Matrix: Welcome to the Desert of the Real* (Exhibit 3); and *Jurassic Park : It's a Dinosaur* (Exhibit 4).⁷

Indeed, in stark contrast to Google's approach of only making limited snippets of three lines from a single page in a book, the clips of films found on Kinolab often amount to a concerningly substantial portion of the underlying work. For example, *Crazy Rich Asians* has six clips totaling 22:44 minutes (Exhibit 5), while the entire work has a run time of two hours and one minute; *Sound of Metal* has ten clips totaling 50:19 minutes (Exhibit 6), while the entire movie has a run time of two hours; and the *Bicycle Thieves* has eight clips totaling 30:11 minutes (Exhibit 7), while the entire run time is one hour and thirty minutes. In other words, the running time of clips for some offered motion pictures represent almost one-half of the running time of the entire movie, and often consist of the most memorable scenes from these movies.

(4) This Ready Availability of Clip Offerings on Kinolab Is Indeed Troubling.

The Kinolab corpus is readily available to the public, at large. Kinolab offers some 2980 clips (2319 Film Clips and 661 clips from TV shows).⁸ Each clip is fully accessible to be streamed from the Kinolab platform or downloaded to the user's desktop without technological protection measures.⁹ The user of the Kinolab platform is even invited to share the specific Kinolab webpage associated with a particular clip to Facebook (i.e., the post feature will provide the webpage to

⁷ These exhibits are Multimedia Evidence being submitted to the Office at the email address provided in the NPRM. That email will contain a link to retrieve the exhibits from a shared Google Drive folder.

⁸ Statistics page, Kinolab available at <https://kinolab.org/Statistics.php>.

⁹ During the course of this proceeding, Kinolab has removed the "Download" tab inviting users to download the clip. (Exhibit 8, screenshot taken on Feb. 6, 2024). Even though the "Download" tab has been removed, clips are readily downloadable with a right click function. (Exhibit 9, screenshot take on Feb. 19, 2024).

view the clip, not the actual clip). Exhibits 10, 10.1. To view the clip, all a user has to do is create an account on Kinolab. Exhibit 11 (“Sign in to watch clips).

And the Kinolab corpus is found behind a *pro forma* walled garden with minimal protection against broad public access. Kinolab requires registration with a valid email address, and completion of an online form having fields to collect name, type of scholar, affiliation, if any, and a description of purpose or desired activity. Registration can be approved within thirty minutes.

Each clip is readily available for streaming and download, and this ready availability of clip offerings, often comprising significant portions of copyrighted works, militates heavily against finding this use fair.

3. The Harm to the Market for the Work

Proponents’ space-shifting and substantial copying of the work, paired with its broad, relatively unfettered provision of the clips to the public, directly and significantly threaten the market for the work. Indeed, as the *Google Books* court recognized:

Even if the purpose of the copying is for a valuably transformative purpose, such copying might nonetheless harm the value of the copyrighted original if done in a manner that results in widespread revelation of sufficiently significant portions of the original as to make available a significantly competing substitute.

Google Books, 804 F.3d at 223. Crediting the snippet function, the court reasoned that “at best and after a large commitment of manpower, [the corpus] produces discontinuous, tiny fragments, amounting in the aggregate to no more than 16% of a book.” *Id.* at 224. This 16% was found to neither threaten the copyright owners nor have a “significant effect upon the potential market for or value of the copyrighted work.” *Id.*

Thus, the court further reasoned that the corpus in *Google Books* would not be a substitute, in large measure due to the snippet function. The snippet function rendered the available work brief, cumbersome, disjointed and, even when snippets were aggregated, the work was incomplete.

Effectively, the court determined that 16% of the work “could [not] provide a significant substitute for the purchase of the author’s book.” *Google Books*, 804 F.3d at 224-25.

The researchers here are using significantly more than 16% of the work. Just in the above sampling, the clips comprise 18% of *Crazy Rich Asians*, 42% of *Sound of Metal* and 33% of the *Bicycle Thieves*. The researchers’ amount of use is significantly more than what was at issue in *Google Books*. Even more troubling is that clips are substantial in length, curated with details, and the number of clips for some movies can readily be aggregated to tell the story of the entire movie.

In fact, the performance of these clips more closely mirrors the objectionable use that the *Google Books* Court explained took “most famous, beloved passages” of music to create ringtones.

The segments taken from copyrighted music as ringtones, in contrast, are selected precisely because they play the most famous, beloved passages of the particular piece — the expressive content that members of the public want to hear when their phone rings. The value of the ringtone to the purchaser is not that it provides information but that it provides a mini-performance of the most appealing segment of the author's expressive content. There is no reason to think the courts in the cited cases would have come to the same conclusion if the service being provided by the secondary user had been simply to identify to a subscriber in what key a selected composition was written, the year it was written, or the name of the composer.

Google Books, 804 F.3d at 227. Here the researchers are accomplishing just that with their “close viewing” text and data mining. The researchers provide some information about the clip. But the researchers are making the clips available through streaming and or downloads, and these clips are indeed performances.

III. Sharing a Corpus Should Not Be Authorized

A. The Proposed Sharing

1. The Proponents Are Inconsistent About the Scope of the Expansion

While Proponents claim that a corpus would be available only to unaffiliated researchers if they already had a copy of the underlying work, they actually argue against this precise requirement. Indeed, the Proponents explicitly recognize that the other requirements of the

exemption would apply even to the broadened class of unaffiliated researchers under their proposed expansion:

To be clear, this means that independent researchers falling under this proviso would still need to comply with all other exemption requirements—they must be affiliated with an institution of higher education as defined in the exemption, that institution must itself own lawfully acquired copies of the underlying works, and the institution must comply with security standards as defined in the regulation.

Initial Comments at 5.

However, notwithstanding this express acknowledgement of the limits of their proposed expansion, Proponents incongruously argue that the proposed expansion should, in fact, allow unaffiliated researchers to use other institutions' corpora regardless of whether they too have copies of the underlying works. Proponents argue that the exemption should be so expanded because "it's hard to find the exact DVD that another group generated their data from." Initial Comments at 27 (citing App. K at 2 (Letter from Lauren Tilton and Taylor Arnold)). That even "small differences between data sets often have an outsized impact on the research results." Initial Comments at 12 (citing App. B at 2 (Letter from Mark Algee-Hewitt)). Similarly, some researchers will not be able to afford to acquire the works. Initial Comments at 29 (suggesting "well-funded research teams are functionally the only ones able to afford the high costs of the corpora curation process"). In fact, the researchers complain about buying additional copies to adhere to the reasonable requirements of the exemption:

One respondent noted that "[i]nstead of the TDM I had planned to do with a larger run of issues digitized by the vendor, I had to use a smaller range of issues that were ones the library originally contributed to the project." Also, another respondent claimed that "instead of using the full content that was collected, I had to choose a very small part."

Initial Comments, App. F at 2. In light of the arguments against the requirement found throughout their Initial Comments, the Proponents' assertion that sharing would require independent

researchers to obtain copies of the work seems very attenuated from the case the Proponents actually put forth.

2. Researchers Are Already Sharing Their Corpus without Any Pretense of Collaboration

Contrary to Proponents' assertions, researchers are sharing their corpora. For instance, Alison Cooper indicates that the Kinolab corpus is only shared with other researchers for "collaboration or replication of the research":

the corpus that Kinolab is building is customized to our ongoing research on the close-up. Yet it would likely be valuable to other researchers if the existing TDM exemption were expanded to allow for corpora sharing beyond "collaboration or replication of the research." Our close-up corpus, with its emphasis on racial, ethnic, sexual, and gender diversity could, for example, serve as an especially useful set of training data to counter the kind of sample bias that has been well documented in machine learning.

Initial Comments, App. G at 2. Notwithstanding Cooper's misleading assertion, Kinolab already appears to be sharing its corpus well beyond the limited collaboration with other researchers permitted under the exemption. Indeed, under its *Research* tab, Kinolab describes its sharing very straightforwardly as offering its "annotated clips [to] serve as training data for machine learning projects that can subsequently assist Kinolab or *other DH-inflected projects* for moving image analysis."¹⁰ Other DH-inflected projects for moving image analysis are not done in collaboration with Kinolab (*i.e.*, Bowdoin College is not pursuing these projects), as these projects, by Kinolab's own admission, are not assisting Kinolab.

Kinolab is further sharing the corpus with site users. Under its *Teaching* tab, Kinolab invites others to crowdsource clips into its corpus. It explains, "Site users that have benefited from the collection in their own research and teaching can 'pay it forward' by adding their own clips,

¹⁰ Research Page, Kinolab available at <https://kinolab.org/Research.php> (emphasis added) (last visited Feb. 12, 2024).

showing that they value this unique open access project and increasing Kinolab’s value for other users.”¹¹ Kinolab provides access to site users who have “benefit[ted] from the collection” pursuing “*their own research and teaching.*” Id. (emphasis added). Site users’ research and teaching are apparently completely independent of the research and teaching conducted and/or offered by Bowdoin College.

All of the above sharing is distinct use from the collaboration that Bowdoin College is seeking. Under the *Collaborations* tab, Kinolab states, “For this reason, we are eager to work with a variety of academic partners in different contexts, from film and media faculty and their students to specific research projects compatible with our objectives.”¹²

3. The Corpus is Not Subject to Any Limitations

a) *Site Users Do Not Need to Be Affiliated with Bowdoin College*

Access of site users is not limited to Bowdoin College researchers, to collaborators of Bowdoin College researchers, or even to researchers affiliated with other higher education institutions. In fact, there is *no requirement* that a site user be affiliated with *any higher education institution*. In the *Kinolab Statement on Fair Use and the Digital Millennium Copyright Act*, Kinolab purports that access is limited: “Kinolab restricts access to its collection to faculty and students and controls that access with password protection.”¹³ However in practice, access to the corpus is open to any scholar. A site user may be an “Independent Scholar” and not provide an

¹¹ Teaching Page, Kinolab available at <https://kinolab.org/Teaching.php> (last visited Feb. 19, 2024).

¹² Collaborations Page, Kinolab available at <https://kinolab.org/Collaborations.php> (last visited Feb. 19, 2024).

¹³ Kinolab Statement on Fair Use and the Digital Millennium Copyright Act (“Kinolab Statement”) at 2 available at <https://kinolab.org/lib/copyright.pdf> (last visited Feb. 12, 2024).

institutional affiliation, “if applicable.”¹⁴ Such unfettered access, rebuffing entirely the reasonable limitations on sharing already present in the exemption, countenances against a further expansion – Proponents have made clear that if given additional leeway, they will continue and expand on their unlawful use.

b) *Having a Copy of the Film in the Educational Institutions’ Libraries Is Not a Requisite to Making Use of Kinolab’s Corpus.*

Kinolab does not require that a site user have his or her own copy of a motion picture or even suggest a need to have lawful access to a copy. Indeed, Kinolab never inquires about a user’s ownership of a copy. In fact, Kinolab actively solicits and accepts clips submitted by users for which even Bowdoin College does not have copies of the motion pictures. For example, Kinolab offers three clips from the motion picture, *Dil Se . .*,¹⁵ as part of its Bollywood genre, even though Bowdoin College does not have this title in its own library.¹⁶ Instead, a copy of this Hindi-language film is available at Colby College. Exhibit 12. Thus, if Kinolab does not look to see if Bowdoin College has specific titles of motion pictures that it is including in its corpus, the Register should have little confidence that researchers will enforce the requirement for independent researchers.

c) *Site Users Can View the Clips as the Clips Are Fully Performed*

Kinolab is intentionally performing the entire clip. Indeed, making these performances available is what Kinolab believes to be the intrinsic value of its offering:

¹⁴ See Registration for Kinolab available at <https://kinolab.org/Register.php> (last visited Feb. 12, 2024).

¹⁵ *Dil Se . .* (lit. “From the Heart . . .”) is an Indian Hindi-language romantic thriller released in 1998. See *Dil Se . .*, Wikipedia available at https://en.wikipedia.org/wiki/Dil_Se..

¹⁶ Information about Bowdoin College library collection is available online through its interface called COMPASS. A search for titles can be done at https://bowdoin.primo.exlibrisgroup.com/discovery/search?vid=01CBB_BOWC:BOWDOIN.

Kinolab's clips are digital-format reproductions of born-digital works (DVDs and/or digitally transmitted video). Clips in the collection present distinctive examples of the film language users are studying and are therefore reproduced in their original format without modifications to aspect ratio or the original work.¹⁷

Intentional performance of the entire original and unaltered clip demonstrates that Kinolab is intentionally flouting the exemption as the exemption specifically limits the viewing of the works in a corpus for verification purposes.

d) *Kinolab Does Not Employ TPMs to Prevent Further Dissemination of Clips*

Kinolab disregards the requirement that it prevent further dissemination or downloading of the clips in its corpus. The exemption specifically requires that technological measures be employed "to prevent further dissemination or downloading of motion pictures in the corpus." 37 C.F.R. § 201.40(b)(4)(D). Beyond registering for an account, Kinolab does not employ any technological protection measure for its clips. As demonstrated by the number of clips downloaded and submitted with this Opposition, a user may download the clips freely, and there are no measures in place to prevent further redistribution.

Kinolab treats its own intellectual property differently than it does the copyrighted works of creators. Interestingly, Kinolab does not include the metadata along with the clip nor does it make the metadata otherwise readily accessible. But if a user is able to make use of the metadata, then Kinolab expects the user to do so under a license.¹⁸ This distinction between sharing the clips and its own metadata is either a double-standard where Kinolab is not so generous with its own intellectual property as it is with creators' content or an admission that users are on the Kinolab platform due to the availability of the expressive works in its collection of clips.

¹⁷ Kinolab Statement, *supra* note 12 at 1.

¹⁸ <https://kinolab.org/about.php>

B. Sharing A Corpus Is Not Fair Use

1. The Proposal Exceeds the Use Permitted under Relevant Precedent.

Proponents' reliance on *Google Books* is misplaced; rather than supporting Proponents, the decision undercuts their arguments. In *Google Books*, libraries were only entitled to download copies – of both the digital image and machine-readable text – of the books *that the particular library submitted to Google for scanning* (*i.e.*, a library could not download copies of books that other libraries submitted). *Google Books*, 804 F.3d at 210. The Court clearly stated, “In these circumstances, Google's creation for each library of a digital copy of that library's already owned book in order to permit that library to make fair use through provision of digital searches is not an infringement.” *Id.* at 229.

No part of the *Google Books* decision suggests that the making digital copies of works for other library participants who did not contribute the work would be noninfringing. *Google Books* did not authorize parts (*i.e.*, individual books) of the whole corpus to be used or copied by other library participants, let alone the type of corpus lending services that Proponents advocate for:

As mentioned, the films and shows we are looking at are common objects of study and would undoubtedly be included in any shared corpus encompassing US moving image history. If researchers could share corpora, then these common films could serve as a basis for everything Instead, much of the time and effort dedicated to every individual study must be spent recreating a corpus composed of many of the same films that other researchers have already collected for their own work.

Initial Comments, App. D at 2.

As the Proponents' own proffered evidence is inconsistent with Proponents' position that sharing researchers would be obligated to have their own institutional copy of the motion picture and otherwise comply with the exemption's restrictions, there is no reason to believe that the researchers will heel to the limitations Proponents suggest.

2. The Request Would Go Beyond the Statutory Limitation Requiring Exemptions from This Rulemaking to Apply Only to Those Beneficiaries Specifically Determined Pursuant to the Rulemaking

Congress created a temporary exemption for persons in situations for which the Librarian has “determined, pursuant to the rulemaking . . .,” that such persons “are, or are likely to be, adversely affected” by virtue of the circumvention prohibition “in their ability to make noninfringing uses” Section 1201(a)(1). The plain language of the statute requires identification of the persons who are adversely affected, and a determination based on the rulemaking that those adverse effects exist in relation to noninfringing uses. There are to be no beneficiaries of the exemption based on vague references or suggestions.¹⁹ In this context, the Proponents are not adversely affected, as the use they seek to make is not clearly noninfringing (and indeed, appears to be infringing), and there are numerous there are available alternatives to circumvention.

3. The Proposed Class is Impermissibly Broad

The proposed class is clearly too broad. Proponents have identified the class in their initial comments to be for the purposes of conducting independent text and data mining research and teaching, where those researchers are in compliance with this exemption.”²⁰ While Proponents may argue that the class is narrowed by the requirement that independent researchers be in compliance with the rest of the exemption, this requirement is meaningless as the overwhelming evidence in Proponents’ comments show that the intended use would not be on these terms.

¹⁹ The NPRM for this proceeding cited prior rulemakings, the 1201 Study and the legislative history for the standard that this rulemaking cannot create broad categorical exemptions that would replicate categorically noninfringing uses. *See Exemptions to Permit Circumvention of Access Controls on Copyrighted Works* 88 Fed Reg 72013, 72014 (Oct. 19, 2023) (“NPRM”) (explaining that a class is refined “by other criteria, such as the [TPMs] used, distribution platforms, and/or types of uses or users”).

²⁰ Initial Comments at 5.

Indeed, the scope of the class and the evidence supporting the class are fundamental to the rulemaking, as the record must identify the noninfringing use in order to determine whether the circumvention prohibition is, in fact, adversely affecting the alleged noninfringing use. The only example that permits the proceeding to proverbially kick the tires of the proposed use is Kinolab. And as discussed above, this corpus involves making uses of works involving close viewing that is unlikely to be noninfringing. Therefore, Kinolab cannot serve as the basis for the proposed uses.

The other examples of sharing corpora are broad stroke descriptions, which provide little basis for a fact intensive determination that the proposed uses are likely noninfringing. Further, the scope and evidence related to the class both militate against the Register reaching the same conclusions made in the last proceeding – that such uses are likely noninfringing. Instead, the evidence plainly indicates the proposed exemption beneficiaries, as Proponents have identified them, apparently have swept in text and data mine uses that far exceed the limited scope of the existing exemption. In fact, to protect against this misuse of the exemption, the Register should clarify that the text and data mining previously authorized was for distant viewing only.

IV. The Circumvention Prohibition Has Not Caused the Alleged Harm

Section 1201 is not causing the alleged harm. First and foremost, the desired use of sharing a corpus with independent researchers exceeds the analogous bounds put on libraries under the Copyright Act. Many libraries, who seek to use books in largely the same manner Proponents seek to use films, and who have been serving a greater public good for a lot longer than these researchers, would make their collections readily available, but do not do so because the law constrains them. The same constraints should apply to the Proponents here.

A. Copyright Law Limits Sharing

Researchers' inability to share corpora has nothing to do with Section 1201 or the employment of technological protection measures. Copyright law recognizes libraries and how libraries or institutions operating libraries may share works in their respective collections. Researchers' desired use to share their own corpora with other nonaffiliated or nonrelated researchers exceeds established copyright principles and library practices. The Copyright Office in this proceeding has no ability to expand the contours of copyright law to permit researchers to do what traditional libraries cannot.

B. Resources

1. Expense of Conducting Research

Researchers complain that conducting their research is expensive. They allege they have had to "invest in physical copies of all the films and television series annotated, store these copies, and devote significant time, technology, and wages to their digitization." Initial Comments, App. E at 2. However, very little – if any – research is ever done on budgets that meet the full desire of the researchers. The purpose of this rulemaking is not to develop public policy on how best a researcher can meet their everyday limitation of budget constraints.

2. Some Alleged Costs Seem to Reflect a Learning Curve

Some of these alleged costs likely reflect one-time costs and the inefficiency of conducting the project for the first time. For example, John Bell complains that it took four months to set up the basic environment for his corpus, and that even with the environment in place, the researchers had technical issues relating to extracting content from the discs. Initial Comments, App. D at 1. Undoubtedly, if John Bell creates another corpus of motion pictures, Bell would have the benefit of this experience to more quickly build a new corpus. Moreover, other researchers can equally

benefit from Bell's experience as nothing prevents John Bell from sharing his experience and practice with subsequent researchers who may need to build their own corpora.

3. Costs Are Due to Unauthorized Uses

Some of the asserted costs are apparently due to the researchers' own unauthorized uses such as close viewing. Indeed, Proponents complaints about the time and wages required for digitalization are as disheartening and they are misleading, as the Proponents had fiercely argued in the prior rulemaking that the current exemption was required for reasons associated with digitalization, *i.e.*, that putting a student to screen record an entire movie was too labor intensive.²¹ Since Proponents now have the exemption, circumvention should greatly ameliorate the costs associated with building a corpus, at least as pertains to the digitalization process. However, while the unauthorized use associated with annotating the films as the researchers described here would undoubtedly be costly, those costs are simply untethered to the costs of the transcoding (*i.e.*, digitalizing) the discs and therefore irrelevant to the determination being made here.²²

Indeed, Proponents' own evidence makes this clear. Allison Cooper explains that from a \$100,000 grant from Mellon Foundation, "only \$6,500 was spent on DVD acquisition and transcoding (breaking TPM) activities: the majority of the grant supported research activities on the part of project faculty, staff, and student curators to build a deliberate corpus of close-up clips." Initial Comments, App. G at 2. She then offers that "Kinolab's largest expenditure for this kind of project on training student curators to closely watch media and reliably identify and annotate

²¹ Authors Alliance *et al*, Initial Comments, App. B at 3 (Letter from David Bamman) (Docket No. 2020-11) ("If a human operator were present for the duration of the screen capture for each movie with an average run time of 2 hours (and worked 8 hours a day, 5 days a week, 50 weeks per year) it would take 10 years to complete the act of digitization alone.").

²² In fact, buying and transcoding DVDs is relatively inexpensive.

aspects of film language” *Id.* Thus, the Register should carefully examine claims whether the complained about costs arise from authorized uses or unauthorized uses.

4. Attrition and Turnover in Students

Attrition and turnover in the field of postdoctoral students is not caused by the prohibition circumvention. This rulemaking cannot write the rules for schools’ policies on whether or which of their graduates should have continue access to research that the graduate led or supported at the school.

V. Conclusion

In light of the lack of factual information regarding the sharing of corpora and the dearth of legal precedent to support sharing corpora, as well as the fact that close viewing is not authorized – and nor should it be – the proposed expansion of the exemption should be rejected.

///

Kinolab

[Collection](#)[Research](#)[Teaching](#)[Collaborations](#)[Contact](#)[Custom search](#)

Crazy Rich Asians (2018)

DIRECTOR(S): Jon M. Chu

GENRES: Comedy, Drama, Romance

An American-born Chinese economics professor accompanies her boyfriend to Singapore for his best friend's wedding, only to get thrust into the lives of Asia's rich and famous.



6 Kinolab Clips



Sightseeing in Singapore

After arriving in Singapore, Rachel (Constance Wu) goes with her boyfriend Nick (Henry Golding), his best friend Colin (Chris Pang) and Colin's fiancée Araminta (Sonoya Mizuno) for a night out ahead of the pair's wedding.

Duration: 00:03:57
Timestamp: 00:19:08
Contributor: [George Elkind](#)

Exhibit 5 Page 2



Arriving at the Young Estate

Peik Lin (Akwafina) drives her old college roommate Rachel (Constance Wu) to the Young estate, where her boyfriend Nick (Henry Golding) is waiting to welcome her and introduce her to his family. When Nick comes out to greet them, he surprises Peik Lin by inviting her to join the party.

Duration: 00:03:49
Timestamp: 00:32:56
Contributor: [George Elkind](#)



Rachel Meets Eleanor

Nick (Henry Golding) accompanies his girlfriend Rachel (Constance Wu) to his mother Eleanor's (Michelle Yeoh) kitchen to introduce them to each other.

Duration: 00:02:33
Timestamp: 00:38:19
Contributor: [George Elkind](#)

Exhibit 5 Page 3



Rachel and Nick Reconnect

Nick (Henry Golding) and Rachel (Constance Wu) spot each other from across the venue where Amarinta (Sonoya Mizuno) is marrying Nick's best friend, Colin. Nick's mother (Michelle Yeoh) and grandmother (Lisa Lu) observe Nick and Rachel's interaction.

Duration: 00:03:57
 Timestamp: 01:25:00
 Contributor: [George Elkind](#)



Family Secrets

At a wedding reception, Nick's (Henry Golding) mother (Michelle Yeoh) and grandmother (Lisa Lu) accuse Rachel (Constance Wu) of lying about her family background. Rachel denies the allegations and flees the reception while Nick chases after her.

Duration: 00:02:46
 Timestamp: 01:32:06
 Contributor: [George Elkind](#)

Exhibit 5 Page 4



Rachel Confronts Eleanor Over Mahjong

Eleanor (Michelle Yeoh) meets her son's girlfriend, Rachel (Constance Wu), at a mahjong parlor. They a competitive game of mahjong in which Rachel discusses Eleanor's disdain for her, Nick's proposal to her, and her reasons for denying it.

Duration: 00:05:42
Timestamp: 01:41:12
Contributor: [George Elkind](#)

Kinolab

Collection Research Teaching Collaborations

Cont Search clips
Custom search

Sound of Metal (2020)

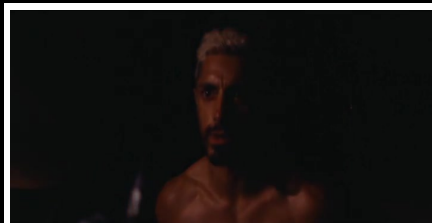
DIRECTOR(S): Darius Marder

GENRES: Drama, Music

Metal drummer Ruben begins to lose his hearing. When a doctor tells him his condition will worsen, he thinks his career and life is over. His girlfriend Lou checks the former addict into a rehab for the deaf hoping it will prevent a relapse and help him adapt to his new life. After being welcomed and accepted just as he is, Ruben must choose between his new normal and the life he once knew.



10 Kinolab Clips



Opening Sequence

Ruben Stone (Riz Ahmed) and his partner Lou (Olivia Cooke) play at one of their concert tours.

Duration: 00:03:55
Timestamp: 00:00:12
Contributor: [Eduardo Mendoza](#)



2/10

Ruben (Riz Ahmed) notices something wrong with his hearing and goes to a doctor.

Duration: 00:06:18
Timestamp: 00:09:23
Contributor: [Eduardo Mendoza](#)



Learn How To Be Deaf

Settling into his new deaf community, Joe (Paul Raci) takes Ruben (Riz Ahmed) to school.

Duration: 00:05:01
Timestamp: 00:46:51
Contributor: [Eduardo Mendoza](#)



Moments of Stillness

As part of Diane's (Lauren Ridloff) class, Ruben (Riz Ahmed) becomes closer closer with the community.

Duration: 00:04:53
Timestamp: 00:59:33
Contributor: [Eduardo Mendoza](#)



Feeling the Piano

Ruben learns a different way to 'hear' music.

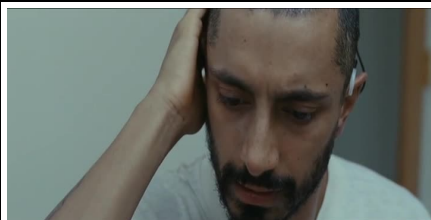
Duration: 00:09:18
Timestamp: 01:17:21
Contributor: [Allison Cooper](#)



Did the Deed

After leaving to get cochlear implant surgery, Ruben (Riz Ahmed) returns to the community to talk with Joe (Paul Raci).

Duration: 00:08:33
Timestamp: 01:20:05
Contributor: [Eduardo Mendoza](#)



Not Like You Remember

Ruben (Riz Ahmed) finally gets his implants activated.

Duration: 00:03:01
Timestamp: 01:31:08
Contributor: [Eduardo Mendoza](#)



Paris

Ruben (Riz Ahmed) flies to Paris to see Lou and meets her father (Mathieu Amalric).

Duration: 00:02:28
Timestamp: 01:34:07
Contributor: [Eduardo Mendoza](#)



Lou's Song

Ruben (Riz Ahmed) watches Lou (Olivia Cooke) and her father (Mathieu Amalric) perform a duet.

Duration: 00:03:16
Timestamp: 01:44:46
Contributor: [Eduardo Mendoza](#)



The Kingdom of God (Closing Sequence)

After leaving Lou (Olivia Cooke), Ruben (Riz Ahmed) finds himself on a park bench, removes his processors, and sits.

Duration: 00:03:36
Timestamp: 01:52:08
Contributor: Eduardo Mendoza

Kinolab

Collection Research Teaching Collaborations

Cont Search clips Custom search

Bicycle Thieves *Ladri di biciclette* (1948)

DIRECTOR(S): Vittorio De Sica

GENRES: Drama

Antonio, an unemployed man in the depressed post-WWII economy of Italy, at last finds a good job hanging up posters, the only requirement for which is that he must have his own bicycle. When Antonio's bicycle is stolen, he and his son are forced to walk the streets of Rome in search of it, or else face ruin.



8 Kinolab Clips



Bicycle Thieves

Antonio is apprehended while attempting to steal a bicycle.

Contributor: [Needs Contributor](#)



In The Church

Antonio and Bruno follow the thief into a church.

Contributor: [Needs Contributor](#)



Opening Sequence

Ricci goes to find work at the unemployment office.

Contributor: [Needs Contributor](#)



Rain in Piazza Vittorio

Antonio and Bruno take shelter from the rain as they search for the missing bicycle.

Contributor: [Needs Contributor](#)



Slammed Window

Antonio asks Maria for her help with his cap.

Contributor: [Needs Contributor](#)



The Pawnshop

Maria and Antonio Ricci pawn their bedsheets for money to buy a bicycle.

Contributor: [Needs Contributor](#)



The Police Station

Antonio goes to the police station to report his missing bicycle.

Contributor: [Needs Contributor](#)



Antonio's Bike is Stolen

A thief takes Antonio's (Lamberto Maggiorani) bike on his first day on the job.

Duration: 00:04:34
Timestamp: 00:17:28
Contributor: [Allison Cooper](#)

Films

In the Mood for Love : *A Dinner With Mr. Chan and Mrs. Chow*

Mr. Chow (Tony Leung) and Mrs. Chan (Maggie Cheung) pretend to have dinner together as the other's spouse.



Tags

Citation

Contributor(s)

Film Language

- Loop
- Show All Controls
- Open Video in New Tab
- Save Video Frame As... **NEW**
- Save Video As...**
- Copy Video Frame
- Copy Video Address
- Picture in Picture
- Cast...
- Open in Reading Mode **NEW**

Films

In the Mood for Love : *A Dinner With Mr. Chan and Mrs. Chow*

Mr. Chow (Tony Leung) and Mrs. Chan (Maggie Cheung) pretend to have dinner together as the other's spouse.



Tags

Download

Citation

Contributor(s)

"A Dinner With Mr. Chan and Mrs. Chow" in *In the Mood for Love*. Directed by Wong Kar-wai, Block 2 Pictures, 2000, *Kinolab*, <https://kinolab.org/FilmClip.php?id=1733>

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David Jonathan Taylor

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A Dinner With Mr. Chan and Mrs. Chow...from In the Mood for Love

In the Mood for Love : *A Dinner With Mr. Chan and Mrs. Chow*

Mr. Chow (Tony Leung) and Mrs. Chan (Maggie Cheung) pretend to have dinner together as the other's spouse.



Sign in to watch clips

Tags

Citation

Contributor(s)

VIDEO - DVD

Exhibit 12



Dil se

Mañiratnam.; Khan, Shah Rukh, 1965- actor; Koirala, Manisha, actor; Zinta, Preity, actor;
Eros International (Firm); India Talkies
London : Eros International, 2000

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Title

Dil se

Creator

Mañiratnam. >
Khan, Shah Rukh, 1965- actor >
Koirala, Manisha, actor >
Zinta, Preity, actor >
Eros International (Firm) >
India Talkies >

Subject

Man-woman relationships -- India -- Drama >
Terrorists -- India -- Drama >

Genre

Foreign films
Drama **Exhibit 12**
Feature films
Video recordings